SAFEGUARDING AND CHILD PROTECTION POLICY and PROCEDURES (Senior and Junior Schools)

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SECTION A – THE SAFEGUARDING POLICY

1. Key Contacts

1.1 School:

Designated Safeguarding Lead (DSL): Mr Nick Pursall (Deputy Head, Pastoral), Tel: 0117 930 3040, email: npursall@qehbristol.co.uk

Deputy DSL, Prevent Duty Officer and first point of contact for Sixth Form, Mr Richard Porter (Head of Sixth Form), Tel: 0117 930 3088, email: rporter@qehbristol.co.uk

Deputy DSL and first point of contact for Years 9 – 11: Ms Naomi Holcombe, (Assistant Head Well-Being and Equity), Tel: 0117 930 3040, email: nholcombe@qehbristol.co.uk

Deputy DSL and first point of contact for Years 7 - 8: Mr Chris Brotherton, Tel: 0117 930 3040, email: cbrotherton@qehbristol.co.uk

Deputy DSL and first point of contact for Years 3 - 6: Mrs Sarah Hall, Tel: 0117 930 3087, email: shall@qehbristol.co.uk

Head: Mr Rupert Heathcote, Tel: 0117 930 3044, email: head@qehbristol.co.uk

Junior School Head: Mr Ross Wolverson, Tel: 0117 930 3087, email: rwolverson@qehbristol.co.uk

Chair of Governors: Mr Kevin Riley, Tel: 0117 930 3049, email: chair@qehbristol.co.uk

Nominated Governor for safeguarding liaison: Mrs Caroline Bateson, Tel: 0117 930 3049, email: bursar@qehbristol.co.uk

1.2 External safeguarding concerns:

Bristol Safeguarding in Education Team: Tel: 0117 922 2710

Children at risk: Bristol Social Services, First Response 0117 903 6444 (out of hours: 01454 615 165)

Children in need: Families in Focus Advice team Tel: 0117 352 1499 email Familiesinfocuspnorth@bristol.gov.uk

Allegations against staff, volunteers, Head, governors, etc.: Local Area Designated Officer (LADO): Tel: 0117 903 7795 or email childprotection@bristol.gov.uk and password protect the referral form.

Police Emergency Tel: 999

Police Non-Emergency Tel: 101 or school liaison officer Mike Woods Tel: 07912 789 457 and email michael.woods@avonandsomerset.pnn.police.uk

NSPCC/Home Office Child Abuse whistleblowing helpline: 0800 028 0285

NSPCC Support Line for Potential Victims of Sexual Harassment and Abuse in Educational settings: 0800 136 663 further guidance see: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-abuse/

1.3 Key local website:

Keeping Bristol Safe Partnership (KBSP) website

https://bristolsafeguarding.org/

1.4 Extremism concerns:

Prevent Team: Tel: 0117 9455539

Prevent Duty Officer, Avon and Somerset Policy: Tel: 0117 945 5543 or email channelsw@avonsandsomerset.pnn.police.uk

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and email counter.extremism@education.gov.uk

1.5 Other useful contacts*:*

Disclosure and Barring Service (DBS): PO Box 181, Darlington, DL1 9FA; Tel: 01325 953795; email: customerservices@dbs.gsi.gov.uk

Forced Marriage Unit: Tel 020 7008 0151; email: fmu@fco.gov.uk

NSPCC: Child Protection Helpline: 0808 800 5000; NSPCC website: https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/

Childline: Tel: 0800 1111; website: https://www.childline.org.uk/Pages/Home.aspx.

1.6 Although referrals in cases of abuse and/or need to children's services are usually made through the DSL, anyone may make a referral using the contact details above.

1.7 Any member of staff or volunteer who has concerns about poor or unsafe practice either in general or in any specific case should follow the guidance given in the school's whistleblowing policy.

1.8 If anyone feels unable to raise their concerns with those who have specific responsibilities for safeguarding or who has reason to believe that the school is not fulfilling its safeguarding obligations then contact should be made with the NSPCC whistleblowing helpline: 0800 028 0285; email help@nspcc.org.uk

1.9 Alternatively in such circumstances as those described in 1.8 above, contact may also be made with the Independent Schools Inspectorate, Tel 0207 600 0100.

2. Statement of Intent

Safety and welfare within the context of an enriching and challenging education for pupils at QEH is our highest priority. Safeguarding and promoting the welfare of children is everyone's responsibility. We take a whole school approach to safeguarding and ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development with the best interests of the child at their heart. At all times we maintain an 'it could happen here' approach to all aspects of safeguarding.

Our role is to know everyone as an individual and to provide a secure and caring environment, so that every pupil may learn most effectively in safety. Where there is a safeguarding concern, school staff (alongside DSL or Deputies) will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Our systems of support are in place, and they are well-promoted, easily understood and easily accessible for

children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

This policy is applicable to the whole school community and is consistent with the requirements of our local safeguarding partnership, the Keeping Bristol Safe Partnership (KBSP) and within the agreed local inter- agency protocols (https://bristolsafeguarding.org) and the single assessment framework (SAF) for the Bristol area (https://bristolsafeguarding.org/media/1175/saf.pdf)

All action taken by QEH will be in accordance with following key DfE guidance documents (amongst others):

- Working Together to Safeguard Children, which sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- Keeping Children Safe in Education, which is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- Revised Prevent Duty Guidance: for England and Wales (December 2023) and The Prevent: Departmental advice for schools and child minders (June 2015)
- The use of social media for on-line radicalisation (July 2015)
- Statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance (2021)

- **Local Guidance from the Local Safeguarding Partnership:** around particular safeguarding topics are available here within the **Keeping Bristol Safe Partnership** website.

- **Government guidance in relation to:**
    - **COVID19:** The government has removed remaining restrictions in England. **QEH** has created an addendum to this document in the event of a further lockdown. This policy is available on request.
    - **Specific topical safeguarding issues –** a collection of up-to-date guidance can be found on the Safeguarding in Education Team's guidance page. Key Guidance: Safeguarding in Education

This policy should be read in conjunction with the following policies:

- School Staff Code of Conduct (including the setting's Low level concerns procedures)
- Educational Visits policy
- Behaviour Management Policy
- Anti-bullying policy
- ICT Acceptable Use and E-Safety policy
- Whistleblowing policy
- Recruitment, Selection and Disclosure Policy and Procedure
- Visiting speaker policy

These policies are available on the school website or by request.

The school is a listening community, committed to ensuring that the views of our pupils are heard, for example through: our school council; PHSE; tutor groups; and other individual or small group discussions. Where listening to a pupil identifies concerns, the safeguarding procedures outlined in this policy will be followed to ensure the appropriate help is sought i.e. early help/social services referral. The views of parents/carers are also important to us and may be communicated through the Head or any listed contact. There are several other important documents relating to safeguarding and these are noted in the relevant parts of this policy. It is important to be aware that safeguarding is an area, which has been subject to significant changes in recent years and we endeavour to ensure that all references are up-to-date.

Safeguarding and promoting the welfare of children is everyone's responsibility and this policy, by considering at all times what is in the best interests of the child and how the school may most effectively provide a safe environment in which children may learn, emphasises this. As well as safeguarding children at risk of harm, we recognise our duty to children in need of early help, so that we may play our part in providing support as soon as a problem emerges. We also recognise the importance of considering appropriate action when we have concerns about a child, as opposed to a child being in immediate danger. All school staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

Copies of this policy, together with our other policies relating to issues of child protection are on our website or available from the school reception. This policy is reviewed annually and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

3. Aim

Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment, whether that is within or outside the home, including online;
- Preventing the impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes;

Child Protection is defined in the Children Act 1989 (s.47) as when a child is suffering, or is likely to suffer significant harm. Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

3.1 We recognise that every member of the school and its community should play a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in identifying and protecting our children who may be vulnerable to many dangers both within and beyond the school itself.

3.2 Children includes everyone under the age of 18 and may in certain circumstances include those who are 18 or above. Where there is any doubt, clarification should be sought from the local children's services.

3.3 As well as following the requirements of the KBSP, the School will take all reasonable measures in the best interests of the children in our care to:

- Ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children in accordance with current DfE and Independent Schools Inspectorate (ISI) guidance
- Ensure that where staff from another organisation are working on their own with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff
- Follow the local inter-agency procedures and single assessment framework of the KBSP
- Be alert to signs of abuse both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil (child on child abuse), noting that bullying may be a child protection matter.
- Adopt a contextual approach to safeguarding and consider whether wider environmental factors that may be present in a child's life could be a threat to their safety and welfare.
- Deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with their agreed child protection plan
- Design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations
- Deal appropriately with concerns, which may have been identified by listening to a pupil, which indicate that a child is in need of early help or additional support
- Be alert to the medical needs of children with medical conditions; including those suffering from mental health issues
- Operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse
- Teach pupils about safeguarding, including child on child abuse for example through use of online resources, through the curriculum and Personal, Health, Social and Economic Education (PHSE (including RSE))
- Take all practicable steps to ensure that School premises are as secure as possible
- Operate procedures to promote the educational achievement of children who are Looked After Children; see Appendix 6
- Have procedures in place for dealing with children that go missing from education; see Appendix 6
- Be alert to the threats of specific safeguarding issues as outlined by Keeping Children Safe in Education, such as Child Sexual Exploitation and Female Genital Mutilation; see Appendix 5
- Have procedures in place to fulfil the School's Prevent Duty, to identify children at risk of radicalisation and extremism, protect them and making referrals as appropriate; see Appendix 7

- Guard against any visiting speaker promulgating extremist views; see Appendix 7
- Ensure provision for teaching children to keep themselves safe, including online and when accessing remote learning.
- Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area
- Keep this and related policies up-to-date and in accord with the statutory guidance.

3.4 This policy provides specific details for the above commitments. In some cases other school policies set out our detailed commitments and appropriate references will be made to these.

3.5 In general, we believe that parents/carers should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents/carers. However, there may be circumstance when, in support of a child about whom there are concerns (including related to terrorism), the DSL will need to consult the Head, the LADO, children's social care and/or the police before discussing details with parents/carers. In a very few cases, it may not be right to inform parents/carers of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the Bristol Children's Social Services.

3.6 In order to protect our children we will reassure victims they are being taken seriously, will be supported and kept safe. We will never give the impression that they are creating a problem and make victims feel ashamed of reporting abuse, sexual violence or sexual harassment.

4. Children at risk of abuse

4.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, threatening harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

4.2 If a child is in immediate danger or at risk of harm or of further harm, a referral should be made to children's social care and/or the police immediately.

4.3 Referrals are normally managed by the DSL or Deputies acting on their behalf; for junior school pupils the DSL (junior school) or their Deputy will normally manage referrals. In all cases the DSL or Deputy will contact the Keeping Bristol Safe Partnership (KBSP) immediately when a child has either suffered or is at risk of abuse. It should be noted that no child should be sent back into a place of potential danger or risk without receiving specific guidance from the KBSP. The management of allegations and disclosures is set down in sections 4, 5, 7, 11, 12 and 14 below.

4.4 Anyone may make a referral to children's services: in such cases the DSL should be informed as soon as possible that a referral has been made.

4.5 The police will always be contacted when a crime is alleged.

4.6 Referral to a statutory agency does not require parental consent. Advice will be sought from and decisions will be made by the KBSP regarding if, how and when the parents or carers of

the child should be informed of any disclosure relating to abuse. The school will comply with the guidance given.

4.7 The latest edition of Keeping Children Safe in Education (KCSIE) sets out various ways in which children may be abused and provides guidance for the identification of possible abuse.

4.8 Types of abuse include: Neglect, Emotional, Physical, and Sexual. See appendix 2 for details of these and their indicators.

4.9 Details of these and other types of abuse (including child on child abuse, radicalisation, child sexual exploitation, and so-called 'honour-based' violence (HBV) including forced marriage, and female genitalia mutilation (FGM)) and guidance on identifying them are set down in the appendix 5, noting that instances of actual or suspected FGM must always be reported to the police.

4.10 Reports to the relevant local agencies must also be made where children are missing from education, since this may be amongst other possibilities a sign of abuse: see 5.8 below.

4.11 Bullying of a child whether by an adult or adults or by another child or other children, directly or through electronic means, is also potentially abuse. The school's anti-bullying and e-safety policies set out the school's strategies for dealing with all forms of bullying including cyber-bullying.

4.12 All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing. The DSL will advise on the recording requirements. The record will be kept by the DSL.

5. Designated Safeguarding Lead (DSL) responsibilities

5.1 The DSL is a senior member of staff who undertakes lead responsibility for safeguarding and child protection within the setting. This responsibility is explicit in the role holder's job description.

5.2 Normally safeguarding concerns for each part of the school should be referred to and managed by the DSL with specific responsibilities for that part, liaising with the nominated governor, Head and other members of the senior leadership as appropriate.

5.3 The DSLs are members of the school's senior leadership with the status and authority to carry out the duties of the posts of DSL and Prevent Officer. Their duties are focused upon the senior and junior parts of the school respectively.

5.4 The DSLs will ensure that every member of the school and its community understands that safeguarding and the welfare of children is everyone's responsibility.

5.5 The DSLs will centre their attention on the needs of the children at the school and will consider at all times what is in their best interests.

5.6 A detailed list of responsibilities for the DSLs is given in the Appendix 9. In brief: these responsibilities cover the following safeguarding areas:

- Activities include the management of work undertaken by any Deputy DSLs.
- Manages early identification of vulnerability of learners and their families from staff through cause for concerns or notifications. This will ensure detailed, accurate, secure

written records of concerns, referrals and the rationale for any decisions made are maintained.

- Manages referrals to local safeguarding partners where learners with additional needs have been identified. These can include those –
    - who need a social worker and may be experiencing abuse, neglect or exploitation
    - requiring mental health support;
    - who may benefit from early help;
    - where there is a radicalisation concern;
    - where a crime may have been committed.
-
- Children in need: concerns should be referred to children's social care as soon as possible, normally by the DSL; where the identification of need is clear then this referral should take place within 24 hours; in cases where there is doubt about the need then the DSL should take advice from the KBSP about how best to proceed.
- Children at risk: concerns should be referred to children's social care immediately, and certainly within 24 hours, normally by the DSL. Where someone other than the DSL makes the referral, the DSL should be informed as soon as possible.
- Children abused by other children: concerns should be referred to children's social care immediately and within 24 hours, normally by the DSL. Where someone other than the DSL makes the referral, the DSL should be informed as soon as possible.
- Children missing from education: all concerns will be reported to the relevant local agencies; in all cases of doubt the relevant local agencies will be contacted for guidance. Such reports will also be made when a child is about to be deleted from the admission register for whatever reason. The school will refer to the DfE guidance for local authorities if a parent indicates they will be electing for home education (EHE) for their child and the LA will be notified.
- Providing guidance for any member of staff or volunteer who has concerns about any other member of staff or volunteer.
- Oversight of and responsibility for the online safety of pupils.
- Allegations against anyone working or volunteering at the school must be referred to the LADO immediately and within one working day, normally by Head unless subject to the allegation themselves, in which case the protocols set down in section 14 below should be followed.
- Seeking confidential (no names basis) guidance from the LADO in those cases where there is any uncertainty relating to such an allegation.
- If a crime may have been committed, the matter should be reported to the police, normally by the DSL unless subject to the allegation themselves. In which case the matter will be handled in accordance with the protocols established in section 14 below.
- Training and general awareness: helping to ensure that all staff, volunteers and governors receive appropriate safeguarding training and guidance, updated as required.

- Specifically ensuring that members of staff, volunteers and governors are fully aware of how they should act should a child make a safeguarding disclosure or should they have a concern about a child.
- Maintaining written records for all individual cases of all communications, discussions, and decisions and the reasons for these decisions.

5.7 DSLs will inform the headteacher/principal of enquiries under s.47 of the Children Act 1989 and any police investigations. This includes the need to be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C 2019.

6. Deputy Designated Safeguarding Lead responsibilities

6.1 The Deputy DSL (senior school) is a member of the school's senior leadership with the status and authority to carry out the duties of the posts of Deputy DSL and Prevent Officer.

6.2 The Deputy DSL (senior school) will act as DSL in their absence and otherwise will carry out safeguarding tasks and duties as specified by the DSL in accordance with the details set down above and in the appendix 9.

6.3 The Deputy DSL (years 3 – 8) is designated to deal with safeguarding matters in years 3 - 8. They will ensure that the senior DSL and Head are fully apprised of all details and seek their guidance if the need arises.

7. Responsibilities of Governors

7.1 The governors have corporate responsibility and oversight for all safeguarding matters relating to the pupils of the school.

7.2 The governing body will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.

7.3 Governors will read and achieve a secure understanding of the current *Keeping Children Safe in Education* (KCSIE) Part 1 and Annex B.

7.4 Governors have specific responsibilities for: ensuring that all staff and those working in the school (teaching, non-teaching, contractors, agency staff and volunteers) are informed of the content and have achieved a secure understanding both of this policy and at least KCSIE Part 1 and Annex B; checking the staff's understanding and implementation of the policy and KCSIE; and ensuring that all staff are aware of the referral process and how to implement safeguarding protocols.

7.5 Governors will promote a climate in which the best interests of the child is paramount and in which it is understood that safeguarding is the responsibility of all. To this end, the governing body has appointed a nominated safeguarding governor to oversee matters relating to safeguarding and child protection. The nominated safeguarding governor is Mrs Caroline Bateson. The nominated safeguarding governor will undertake appropriate multi-agency training and will attend refresher training at least every two years.

- The nominated safeguarding governor is responsible for ensuring that the school's policy and procedures are consistent with the Keeping Bristol Safe Partnership procedures. To this end, they will ensure that this policy is reviewed in detail and approved by them at least annually.
- The nominated safeguarding governor will meet with a group of pupils, with members of staff and with deputy DSLs to have open discussions on age appropriate areas of safeguarding. The nominated safeguarding governor will monitor the policy, procedures and the efficiency with which they are implemented to review overall effectiveness of safeguarding at QEH.
- The appointed Safeguarding Governor will liaise with the Head and DSL to produce an annual report for governors and complete the mandatory S.175 (biennial safeguarding) audit for Keeping Bristol Safe Partnership.
- Ensure that learners are taught about safeguarding on the curriculum including online safety in compliance with statutory guidance Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk) and Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
    - Ensure that there are procedures in place to manage safeguarding concerns or allegations against teachers, including supply teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners, this includes having a process to manage low level concerns. Ensure that systems are in place for learners to effectively share a concern about a safeguarding issues they are experiencing, express their view and give feedback.
    - Ensure that QEH has systems in place to prevent, identify and response to child on child abuse (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices.
- They shall ensure that there are clear job specifications for the DSLs and Deputy DSLs.
- They shall ensure that child protection files are maintained as set out in KCSIE Annex C.
- They shall ensure that all those working in the school understand their own safeguarding duties and responsibilities.
- Ensure they review the Department for Education filtering and monitoring standards and make sure the setting is compliant with the requirements to meet these duties through discussions with IT staff and service providers.
- The nominated safeguarding governor, and in their absence the chair of governors, will liaise directly with the LADO in the event of a safeguarding-related allegation against the Head or a member of the board.
- They shall receive from the DSL a safeguarding report at each meeting of the governors.
- They shall receive appropriate and regular training to assist them in the proper fulfilment of their corporate responsibilities for safeguarding.
- They shall receive appropriate safeguarding induction training.
- They shall ensure that arrangements are in place so that there is always a member of staff with appropriate training and status on site during the working day to deal with safeguarding matters.

- They shall ensure that at least one of the Head and the DSL attends any formal meeting of governors at which safeguarding matters are discussed.
- Governing bodies and proprietors should take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

8. Safer recruitment, the Single Central Register and visitors

8.1 QEH follows the Department for Education's recommendations for the safer recruitment and employment of those staff and volunteers who work with or nearby children and acts at all times in compliance with the Independent School Standards Regulations. The school operates safer recruitment procedures including required pre-appointment checks on teaching and non-teaching staff, volunteers, governors, supply staff, staff of contractors and other individuals, in accordance with the school's Safer Recruitment Policy.

8.2 QEH pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (202; Part 3)

- This includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed.
- Also including undertaking online safety checks on shortlisted candidates. Undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity.
- All recruitment materials will include reference to QEH's commitment to safeguarding and promoting the wellbeing of learners.

8.3 At least one member of any appointment panel will be trained in safer recruitment.

8.4 In addition, as part of the shortlisting process QEH will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the setting might want to explore with the applicant at interview.

8.5 In line with the Department for Education's current guidance Keeping Children Safe in Education (KCSIE), the School prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required.

8.6 Our safeguarding checks apply to all those who may be in contact with or work nearby children: teaching and non-teaching staff – full-time, part-time and temporary – peripatetic musicians, sports coaches, counsellors, contractors employed by the school directly, volunteers, governors, visiting speakers and anyone else with access to the pupils of the school.

8.7 A Single Central Register (SCR) of appointments is rigorously maintained. All employees,

governors, supply staff, volunteers and others working within the school are checked in accordance with the full requirements of the SCR before starting work and the details of these checks are recorded in the SCR.

8.8 Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation such as a supply agency or activities provider and working with the school's pupils at school. Appropriate supervision is always in place whenever needed.

8.9 Through risk assessments the school also ensures that appropriate checks have been made upon the staff of other organisations working with our pupils on external trips and visits.

8.10 In any case where the required documentation is unavailable or checks have not been completed prior to the starting date for any member of staff or other adult who may have access to children, then a risk assessment will be carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date.

8.11 Appropriate safeguarding and Prevent Duty checks, including appropriate background checks, upon visiting speakers and other visitors will be made and recorded; see Appendix 7.

8.12 Please also refer to the school's written Recruitment Policy for further details.

9. Responsibilities of all staff and volunteers

9.1 Safeguarding is everyone's responsibility. It applies to all who work or volunteer, or learn, or supply services to our school.

9.2 All staff will read and understand Part 1 of statutory guidance Keeping Children Safe in Education. Those working directly with children will also read Annex B.

9.3 In addition to this all staff will be aware of the systems in place which support safeguarding including; reading this Safeguarding/Child Protection Policy; the Behaviour Policy; the Staff Behaviour Policy (code of conduct); safeguarding response to children who go missing from education; and the role of the Designated Safeguarding Lead (DSL).

9.4 All staff and volunteers have a responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a child is in immediate danger, at risk of significant harm and/or in need of support services.

9.5 When implementing our safeguarding policy full and accurate records must be kept. All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing and stored confidentially on CPOMS, including any referrals.

9.6 All pupils have their own separate file within CPOMS. Records include:

- Clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

To promote a child's welfare and prevent issues escalating we will:

- Listen to the views of the child

- Re-assess concerns when situations do not improve
- Share information with the right people and in a timely fashion
- Challenge those who appear not to be taking action

9.7 All should have a clear awareness of the different forms of and indicators of abuse; see Section 3 above and the Appendix 2.

9.8 All should be aware that behaviours such as those linked to drug taking, alcohol abuse, truanting, and sexting put children in danger

9.9 All should be aware that safeguarding issues may manifest themselves via child on child abuse. This may well include but is not limited to: bullying (including cyber bullying), gender based violence or sexual assaults and sexting; see Section 4 above. If a child is at risk of significant harm from a peer, the KBSP will be contacted immediately.

9.10 As well as having a clear awareness of the different forms and signs of abuse, all should demonstrate an awareness of the dangers of: extremism and radicalisation, child sexual exploitation, female genital mutilation, and forced marriage.

9.11 All staff will know how to contact the DSL and any deputies, the Chair of Governors, and the Governor responsible for safeguarding.

9.12 All staff will be able to identify vulnerable pupils and take action to keep them safe. Information or concerns about pupils will be shared with the DSL where it is includes those:

- who need a social worker and may be experiencing abuse, neglect or exploitation,
- requiring mental health support,
- may benefit from early help
- where there is a radicalisation concern
- where a crime may have been committed

9.13 All staff will be clear as to the school's policy and procedures with regard to child on child abuse, children missing education and those requiring mental health support.

9.14 Any member of staff or volunteer should immediately report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL even where they make a referral themselves – unless the DSL is implicated in any disclosure or allegation, in which case they should follow the guidance given in section 14 below.

9.15 All staff and volunteers should refer any concern about another member of staff or volunteer to the Head. In the absence of the Head, reports must be made to the Chair of Governors directly and the Head informed as soon as is practicable. Specific allegations should be dealt with in accordance with section 14 below.

9.16 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. They should also have confidence that all such concerns will be taken seriously by the governance and senior leadership of the school. The school's Whistleblowing Policy provides guidance as to how such concerns may be raised.

9.17 Where that confidence is lacking or they feel unable to raise an issue with the school directly, staff and volunteers should follow the guidance given under whistleblowing: see 1.8 and 1.9 above.

9.18 Additionally all staff and volunteers are expected to make themselves available for appropriate training if necessary out of normal school hours and to read both this policy and Part 1 and Annex B of the current edition of KCSIE. Special arrangements will be put in place for anyone who is working in the school temporarily or whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE and Annex B.

9.19 All staff will receive appropriate safeguarding and child protection refresher training (including online safety incorporating staff responsibilities in relation to filtering and monitoring) at least annually. . It is also recognised that dealing with safeguarding issues can impact upon the wellbeing of staff and de-briefing with the safeguarding team is encouraged.

10. Training and Induction: DSLs, staff, and volunteers

- 10.1 The DSL and Deputies will undergo formal training to provide them with the knowledge, skills (including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and training required to carry out the role. The training will be updated at least every two years.

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10.2 All those new to working in the school either as a member of staff, contract or supply worker, or volunteer will receive induction training which will include familiarisation with and a secure understanding of at least the following policies and procedures. In particular staff will be provided with:

- This Safeguarding Policy (which includes the protocol for Children Missing in Education and the roles of the DSL and Deputy DSLs)
- The Staff Code of Conduct including protocols on acceptable use of IT and social media contact with pupils and guidance on staff / pupil social contact
- The school's Behaviour Policy for pupils
- The school's Whistleblowing Policy
- Part 1 of the current edition of KCSIE including Annex B for frontline staff.

10.3 Induction training will also cover:

- The school's Anti-Bullying and E-Safety Policies
- The school's Prevent strategies including guidance as to how children at risk of radicalisation may be identified
- Safeguarding response to children who go missing from education
- Low level concerns policy
- The local safeguarding procedures as laid down by the KBSP.
- Online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring

- Staff training will include clear reference to the internal whistleblowing policy, the role of the Local Authority Designated Officer and guidance for escalating concerns.

10.4 All those working in the school either as a member of staff or volunteer will receive further training annually to ensure that safeguarding issues remain uppermost in their thinking and to highlight any specific changes which impact upon the safeguarding policies and practices of the school.

10.5 Training around safeguarding topics in Annex B (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) will be integrated, aligned, and considered as part of a whole school safeguarding approach.

10.6 In addition to any formal training, all those working in the school in any capacity will receive regular safeguarding and child protection updates including Prevent and on-line safety, for example by email bulletins and through staff meetings, at least annually to provide them with the relevant skills and knowledge to safeguard children effectively.

10.7 All those working within the school on a temporary basis will receive appropriate safeguarding guidance.

10.8 The staff standards of conduct contain guidance for staff about their behaviour and actions so as not to place pupils and staff at risk of harm or of allegations of harm to a pupil. This includes guidance on one to one teaching and trips and visits away from the school itself.

SECTION B – SAFEGUARDING PROCEDURES FOR STAFF

11. Recording concerns

11.1 Early recognition of safeguarding concerns is essential. The signs of abuse are not always obvious, and a pupil may not tell anyone what is happening to them. Sometimes pupils do not realise that what is happening to them is abuse. Pupils mature and develop at different rates and this should be considered, particularly for pupils who are in a year group not in line with their biological age.

11.2 All staff should be aware of indicators of abuse and neglect (see Appendix 2), understanding that children can be at risk of harm inside and outside of the School, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect, so that staff are able to identify cases of children who may be in need of help or protection.

11.3 All staff are clear about recording and reporting concerns to the DSL/DSL deputies in a timely way. In the case a learner is in immediate danger, staff should phone the police.

11.4 All staff are aware of and follow the procedures to respond to a concern about a child detailed in appendix 8. This includes responses to child-on-child harm and learners who present with a mental health need. Staff are aware that if they have a mental health concern about a child that this is also a safeguarding concern. Therefore, immediate action should be taken following the procedures in this policy and speaking to the DSL.

11.5 At **QEH** learners can raise their concerns via reporting to a trusted adult or anonymously through the pastoral concern reporting tool and they will be treated seriously.

12. Responding to incidents of Child on child harm

12.1 All staff should recognise that all children can abuse their peers (including online). It is important that incidents of abuse and harm are treated under this safeguarding policy in conjunction with the behaviour policy. However, concerns regarding the welfare of learners requires process and records to be kept on the child's digital safeguarding/child protection file.

12.2 It is recognised that child on child abuse can happen inside and outside of school/college or online.

12.3 QEH takes a whole school approach to child on child abuse by understanding the importance of all staff challenging abusive behaviours between peers. Staff are required to report any concerns directly to the DSL.

12.4 At QEH there is a 'zero tolerance' approach to all forms of abuse, including child on child abuse. Incidents are taken seriously. These will never be tolerated or passed off as 'banter,' just having a laugh' or 'part of growing up.' Banter and teasing can and should be

acknowledged and recognised as bullying behaviour and may require proportionate intervention.

12.5 Even with a zero-tolerance approach, we take steps to educate and take action ensure to mitigate the risk of contributing to a culture of unacceptable behaviours or a culture that normalises abuse. Furthermore, even when there are no reported cases of child on child abuse, this does not mean it's not happening.

12.6 It is understood that child on child harm may reflect equality issues in terms of those who may be targeted are more likely to have protected characteristics.

12.7 Child on child abuse is often gender related with girls more likely to be victims and boys more likely to be perpetrators but all child on child abuse is unacceptable and will be treated seriously.

12.8 All children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to):

- Bullying (including cyberbullying);
- Abuse in intimate personal relationships between peers;
- Sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nude and semi-nude images and / or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting
- Initiating/hazing type violence/rituals.

12.9 Early identification of vulnerability to child on child harm is made by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.

12.10 There are clear systems in place (which are well promoted, easily understood and easily accessible) for learners to confidently report abuse knowing their concerns will be treated appropriately and confidentially. QEH will handle initial reports of harm by:

- Securing the immediate safety of learners involved in an incident and sourcing support for other children affected.
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.;

- ensuring that victims will never be given the impression that they are creating a problem by reporting and form of abuse, neglect, exploitation, sexual violence, or sexual harassment. They will never be made to feel ashamed for making a report.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- It is also important that staff determine how best to build trusted relationships with children which facilitates communication.
- Ensuring the child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the target and other members of the wider peer cohort.
- Not promising confidentiality as it is highly likely that information will need to be shared with others.
- Records of the investigation will be kept within each pupil's CPOMS file.
- Pastoral support will be provided to all children involved.

Responding to Sexual Violence and Sexual Harassment

12.11 Reference to Keeping Children Safe In Education (Part 5) should be made in relation to taking protective action. QEH will take the following actions when responding to incidents of sexual violence and sexual harassment:

- The starting point regarding any report will always be there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- Incidents will be reported immediately to the DSL/ Deputy DSL who will undertake further assessment of what action should be taken proportionate to the factors that have been identified. The Brook - Sexual Behaviours Traffic Light Assessment Tool should be utilised to inform assessment of risk and what actions to subsequently take. This may include seeking specialist advice and guidance from Be Safe.
- DSLs/Deputies will take **proportionate** action and consider whether a case can be managed internally, through early help, or should involve other agencies as required in line with the section 2.4 - Multi-Agency Working section.
- When an incident involves an act of **sexual violence** (rape, assault by penetration, or sexual assault) the starting point is that this must be reported to the police immediately **regardless** of the age of criminal responsibility (10 years old). This must be reported directly via 101 for recording purposes and accountability. This is on the understanding that the police will take a welfare approach rather than a criminal justice one. A concurrent referral to social care must also be made for all children directly involved. A strategy can be requested where education can voice explicitly concerns of criminalisation in a multi-agency context.
- When the children involved require a statutory assessment either under s.17 or s. 47 of the Children Act 1989 a referral to social care should be undertaken.

- Where the report includes an online element, the setting will follow Searching, screening and confiscation at school - GOV.UK (www.gov.uk) and Sharing nudes and semi-nudes: advice for education settings working with children - GOV.UK (www.gov.uk). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.
- Risk assessments and or safety plans will be developed for individual children who have been involved in an incident including any bystanders. This should be reviewed every 3 months or every time there is an occurrence of an incident. These should involve the child and parents/carers and address contextual risks.
- DSL and Deputy DSL(s) will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.

Contextual safeguarding approach to child-on-child harm

12.12 QEH will minimise the risk of child-on-child harm by taking a contextual approach to safeguarding by increasing safety in the contexts of which harm can occur – this can include the settings environment itself, peer groups and the neighbourhood.

12.13 Following any incidents of child-on-child harm, the DSL/Deputies will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. This can include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics on the curriculum.

13. Recognising children at greater risk of harm (including key safeguarding areas)

13.1 Support and interventions are required not just for children at risk of abuse but also for those in need of additional support from external agencies including inter-agency working to provide early help for children in need.

13.2 Children may have a variety of needs, for example, mental health concerns; missing education; self-harming; SEND and/or medical needs; eating disorders. The school aims to address, alleviate and resolve such matters alongside appropriate external agencies.

13.3 Additional barriers can exist when recognising abuse, neglect and exploitation in children with SEND needs. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to child on child isolation or bullying
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges

- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

13.4 Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the SENCO or the named person with oversight for SEND in a college.

13.5 Where there is a concern about a child (as opposed to a child being in immediate danger) there should be a conversation with the DSL or Deputy DSL to agree a course of action with due regard to the referral thresholds of the KBSP.

13.6 Referrals are normally managed by the DSL who will contact the relevant local agencies when a child is identified as being in need of additional support. However, anyone may make a referral, informing the DSL as soon as possible. Wherever possible and dependent upon the guidance received from local children's services the parents, carers or guardians of the child concerned will be involved in the referral and the resolution of any concerns.

13.7 The local services are advised to make a decision on the course of action to be taken and to communicate this to the referrer within one working day of the referral being made. If the information is not forthcoming then the matter should be followed up immediately by the DSL.

13.8 If, after a referral the situation does not appear to be improving, the DSL or the person who made the referral should press for reconsideration to ensure that their concerns are addressed effectively so that the child's situation improves.

13.9 Where early help or other support is appropriate, the case should be kept under constant review and the DSL should support the staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. If the child's situation does not appear to be improving then consideration should be given to referring the case to children's social care.

13.10 Where a child goes missing from education either for a period of 10 school days or for fewer days but regularly or as otherwise directed by the local agencies, the school will be alert to possible reasons for this including abuse, child sexual exploitation, travelling to conflict zones, FGM and forced marriage and will refer all such concerns to the relevant local agencies.

13.11 All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing. The DSL will advise on the recording requirements. The record will be kept by the DSL.

Key safeguarding areas

13.12 These topics are themes that can impact on children and families, there are specific areas of safeguarding that the setting has statutory responsibilities to address which are hyperlinked:

- Child abduction and community safety incidents
- Children in the court system
    - Young witness booklet for 5 to 11 year olds - GOV.UK (www.gov.uk)
    - Young witness booklet for 12 to 17 year olds - GOV.UK (www.gov.uk)

- Children affected by parental offending/imprisonment.
- Children missing from education – including persistent absence.
- Child Exploitation (including both Child Sexual Exploitation and Child Criminal Exploitation and county lines, modern day slavery and trafficking)
- County lines and/or gangs
- Cybercrime
- Domestic Abuse
- Homelessness
    - Modern slavery and the National Referral Mechanism
- So-called Honour based Abuse (including Female Genital Mutilation and Forced Marriage),
- Online Safety
- Mental health
- Child-on-child harm:
    - Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
    - Abuse in intimate personal relationships between children (also known as teenage relationship abuse).
    - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
    - Sexual violence, such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence).
    - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
    - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
    - Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).
    - Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
    - Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Preventing Radicalisation (The Prevent Duty)
- Serious Youth Violence
- Substance Misuse
- Private Fostering
- Young Carers
- The response to a report of sexual violence and sexual harassment between children in schools and colleges (see section 11 for further details).

Additional information about key safeguarding areas can also be found in Keeping Children Safe in Education (Annex B); the NSPCC website - Types of Abuse;

And for localised resources for education settings The Bristol Safeguarding in Education website.

Identifying and monitoring the needs of vulnerable learners

13.13 The DSL and Deputy DSL will regularly review and monitor those students who have been identified as vulnerable. This can include reviewing attendance data, behaviour data, attainment data and safeguarding records. This is to ensure that:

- Proportionate and early interventions can be taken to promote the safety and welfare of the child and prevent escalation of harm.
- Information about vulnerable learners is shared with teachers and the settings leadership staff to promote educational outcomes.
- Learners who currently have, or have had, a social worker will have their academic progress and attainment reviewed and additional academic support will be provided to help them reach their full potential.
- Reasonable adjustments are made in relation to setting-based interventions – for example responding to behaviour.
- **QEH** can support learners who may have intersecting protected characteristics. **QEH** recognises those with protected characteristics are likely to be more vulnerable to negative experiences of discrimination both explicitly and or systemically.
- **QEH** will work in the **best interests of the child** in compliance with their equality and human rights legal duties.

14. Guidance to staff

What to do if you have a safeguarding concern or suspect abuse

14.1 Staff members should maintain an attitude of **"it could happen here"** where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interest of the pupil.

14.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful, e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability, sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identity cases of children who may in need of help of protection.

14.3 It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on to DSL or deputy DSL.

14.4 All concerns about a child or young person should be reported immediately either in person to the DSL/Deputy DSL or recorded on CPOMS. A CPOMS record should be: a clear

and comprehensive summary of the concerns. It should provide details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

14.5 All staff must report on CPOMS any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record on CPOMS and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

14.6 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Bristol Children's Services (First Response: 0117 903 6444). All information and actions taken, including the reasons for any decisions made, will be fully documented.

14.7 If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Bristol Children's Services immediately (First Response: 0117 903 6444). Anybody can make a referral in these circumstances. If the child's situation does not appear to be improving, the staff member with concerns should press for reconsideration by raising concerns again with the DSL and/or the Head.

Managing a pupil disclosure

14.8 If a child makes a disclosure relating to a safeguarding matter or potential abuse then the following strict guidance should be followed:

- If there is a need for medical attention, seek assistance without delay.
- Listen sensitively to what the child has to say and take them seriously. Staff need not be judgemental and refer the information to the DSL immediately.
- Do not ask leading questions. Instead ask open questions that allows the pupil to describe the incident to the best of their ability.
- Reassure the child but do not give a guarantee of absolute confidentiality and explain that the information must be shared with the DSL who will ensure the correct action is taken.
- Record contemporaneously – as much as possible in the actual words of the child – what is said relating to the disclosure. The record should include the date, time and place of the conversation and include a synopsis of what has happened and who was present. The written record should be passed to the DSL immediately.
- Do not ask questions other than to clarify what is being said.
- Do not attempt to investigate the disclosure or to contact in any way any person mentioned in the disclosure.

- Acknowledge how difficult it must have been for the child to speak and reassure them that you will ensure that the matter is now dealt with.
- When the child has finished speaking, do not leave the child alone. Call for immediate assistance from the DSL or Deputy DSL or follow the procedures for allegations against staff, volunteers, and governors in Section 14. The DSL (or other responsible person within the scope of this policy) will then deal with the matter.
- Sign (with time and date) all notes made and give them, in person, to the DSL (or other with DSL training).
- Do not speak to anyone about the fact or content of the disclosure without the full written authority and on the written direction of the DSL and/or Head.

14.9 The above strict guidance relates to any disclosures involving events within or outside the school or concerning adults or other children.

14.10 Although referrals are normally managed by the DSL, as already pointed out, anyone may make a referral if necessary using the external contact details in Section 1; but if so, then the DSL should be informed of the referral as soon as possible.

14.11 As a result of their knowledge, position and/or the authority invested in their role, all adults working with children in education settings are in positions of trust in relation to the children in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable children and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

14.12 Wherever possible, staff should avoid behaviour, which might be misinterpreted by others, and report either to a DSL or to a member of the senior leadership and record any incident with this potential. Staff should refer the school's Staff Handbook, which also includes its Social Media Policy.

15 Allegations against any member of staff that may or may not meet the harms threshold.

Allegations that may meet the harms threshold.

15.1 Any allegation against any member of staff that may meet the harms threshold will be referred to the LADO without delay.

15.2 QEH has processes and procedures in place to manage any safeguarding allegation, or concern (no matter how small), about staff members (including supply staff, volunteers, and contractors). Staff must report any concerns or allegations about a professional's behaviour, but more urgently where they may have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

15.3 Allegations concerning all other than the Head (but including the Head of the Junior School) are to be reported to the Head, who will immediately contact the LADO to discuss the allegation.

15.4 Allegations concerning the DSL are to be reported straight away to the Head without informing the DSL. The Head will immediately contact the LADO to discuss the allegation.

15.5 Allegations concerning the Head are to be reported straight away to the Chair of Governors without informing the Head. He will immediately contact the LADO to discuss the allegation.

15.6 Allegations concerning the governors other than the Chair are to be reported straight away to the Chair without informing the governor concerned. He will immediately contact the LADO to discuss the allegation.

15.7 Allegations concerning the Chair of Governors are to be reported straight away to the Head (or in his absence the nominated governor for safeguarding) without informing the Chair. The Head will immediately contact the LADO to discuss the allegation.

15.8 If there is a conflict of interest which inhibits this process of reporting, staff can report directly to the LADO.

15.9 If allegations are regarding a member of supply staff, the setting will take the lead and progress enquiries with the LADO, whilst continuing to engage and work with the employment agency.

15.10 In each case above, the LADO will be given sufficient detail to allow them to consider the nature, content and context of the allegation and to agree a course of action including any involvement of the police. The police will be informed if a criminal offence is alleged.

15.11 Guidance will be sought from the LADO and/or police to enable the school to make a decision about whether or not the person against whom an allegation has been made should be allowed to remain on school premises and if so what if any conditions should apply.

15.12 Having contacted the Bristol LADO, the Head may choose to 'appoint' a case manager (Deputy Head or Bursar). The Chair of Governors may appoint the Safeguarding Governor as the case manager.

15.13 If the school identifies that a child has been harmed, there may be an immediate risk of harm to a child or the situation is an emergency the school will contact children's social care and as appropriate the police immediately.

15.14 Appropriate support will be provided for any children involved in the allegation and for their families.

15.15 Appropriate support will be offered to the person against whom an allegation has been made.

15.16 No internal investigation should take place unless and until authorised by the LADO.

15.17 Staff are aware of the following whistleblowing channels for situations where they feel unable to raise an issue with the senior leadership team or feel that their genuine concerns are not being addressed. General guidance can be found at: Advice on whistleblowing https://www.gov.uk/whistleblowing. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff

can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

Allegations that may not meet the harms threshold (also known as Low level concerns)

15.18 Low level concerns - this should be read in conjunction with the staff code of conduct and Keeping children Safe in Education (Part 4).

15.19 A low-level concern is not insignificant. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers, or contractors) that does not meet the harm threshold, then this should be shared in accordance with QEH's low-level concerns policy

15.20 QEH takes a whole-school approach to safeguarding and promotes an open and transparent culture to create and embed a culture of openness, trust and transparency in which the school's or college's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff (see Staff code of conduct). All staff understand their role in the safeguarding of children and that sharing concerns helps to minimise the risk of abuse and identify any weaknesses in the School's safeguarding system.

15.21 Safeguarding concerns may arise in several different ways from a number of different sources: complaint, disclosure, suspicion made by a child, parent or adult within or outside the school. Where these safeguarding concerns do not meet the harms threshold the term 'low-level concern' is used. This does not mean they are insignificant; it means the behaviour does not meet the thresholds as outlined above.

15.22 A low-level concern is any concern – no matter how small, and even if no more than a sense of unease or 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. A low-level concern does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

15.23 Examples of such behaviour may include, but are not limited to: being overly friendly with children, having favourites, engaging with a child on a one-to-one basis in a secluded area or behind a closed door with no window, using inappropriate sexualised, intimidating or offensive language and taking photographs of children on their mobile phone.

15.24 Such behaviour can exist on a wide spectrum, from that which is inadvertent, thoughtless or may look inappropriate in the circumstance to that which is intended to enable abuse.

15.25 Staff should feel confident to self-refer if they find themselves in a situation that could be misinterpreted, might appear compromising to others, and/ or on reflection they feel they have behaved in such a way that they consider falls below the expected professional standards.

15.26 All reports of low-level concerns should be passed to the DSL using the low-level concern form, unless the concern is about the DSL when it should be shared with the Head, if it is regarding the Head the information should be shared with the Chair of Governors.

15.27 If the allegation is against the Head the information should be shared with the Chair of Governors. All low-level concerns raised will be responded to in a sensitive and proportionate manner and dealt within an appropriately timeframe. Where appropriate, addressing any unprofessional behaviour and supporting individuals to correct it at an early stage.

15.28 Reports about supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

15.29 The DSL will address unprofessional behaviour and support the individual to correct it at an early stage providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.

15.30 The DSL will review and correct any deficits in the setting's safeguarding system.

16. Referrals to Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA)

16.1 The school will report promptly and within five working days to the Disclosure and Barring Service (DBS), any person (whether employed, contracted, a volunteer or student) who has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had she or he not left earlier).

16.2 Where a teacher has been dismissed for misconduct (or would have been dismissed had she or he not resigned first), taking full account of statutory guidance the school will give due consideration to making a referral to the Teaching Regulation Agency (TRA).

17. Educating pupils about safeguarding, dangers of the internet and radicalisation

17.1 QEH is dedicated to ensuring that pupils are taught about safeguarding, including online safety. This is part of a broad and balanced curriculum. The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Policy and in enforcing our Anti-Bullying Policy.

17.2 The following programmes will be used to ensure that pupils develop a clear understanding both of safeguarding issues and of the dangers of radicalisation and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers posed for example by the internet and by radicalisation:

- Working within statutory guidance in respect to Relationship, Sex and Health Education
- Relationships, Social, Health and Economic (RSHE) education, to explore key areas such as self-esteem, emotional literacy, assertiveness, power, building resilience to radicalisation, e-safety and bullying.
- Appropriate filters and monitoring systems are in place to ensure that 'over- blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regard to online teaching and safeguarding.

- The curriculum will be shaped to respond to safeguarding incident patterns in the setting identified by the DSL and safeguarding team (e.g., to respond to an increase in bullying incidents).

17.3 The PHSE programme covers other issues that play a part in safeguarding children. As well as covering anti-bullying, cyber safety and the issue of radicalism and extremism, other issues such as mental health and body image are also covered in a structured programme.

17.4 Additionally whenever appropriate subjects in the curriculum and extra-curricular activities will be used to reinforce the messages given. Assemblies, English, History, Drama and RP lessons provide opportunities to promote tolerance and mutual respect and understanding.

17.5 We recognise that pupils themselves have much to contribute to the discussion of the issues which face them and the school, so we welcome their views and provide opportunities for them to discuss these for example through the school council, in lessons or in small group or individual sessions.

17.6 All pupils know that there are adults to whom they can turn to if they are worried, including the school counsellor, the chaplain and the medical staff. If the school has concerns about a child, there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- Every pupil is issued with a school planner, which contains guidance on where to turn for advice both in and out of school, including confidential help lines and web addresses for external specialists such as ChildLine, Kooth and the Samaritans.
- Our medical centre displays advice on where pupils can seek help.
- We provide leadership training to our Prefect team, Heads of house and Peer Mentors which specifically covers child protection issues, and the importance of offering support and assistance to younger and to vulnerable pupils.
- Pupils have the opportunity to inform the curriculum via discussions with the school council and student body.
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the school's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection.

17.7 Online safety is an integrated and interwoven theme with other safeguarding considerations. It is essential that the DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise such as the IT manager.

- QEH is committed to addressing online safety issues around content, contact, conduct and commerce. This includes:
- Ensuring that online safety is concerned in relevant policies and procedures.
- Online safety is interwoven in safeguarding training for staff and safeguarding on the curriculum for learners.
- QEH makes provision for teaching children to keep themselves safe, including online and when accessing remote learning.

- Take steps to ensure that appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate material on-line through the use of the 'Sophos' and daily monitoring of on-line usage. This also refers to the use of mobile technology via 3G/4G/5G as outlined in the ICT Acceptable Use and E-safety policy.
- Acknowledging that child on child abuse can happen via mobile and smart technology between individuals and groups.
- Provision of education via remote learning will comply with current governmental advice Safeguarding and remote education during coronavirus (COVID-19) - GOV.UK (www.gov.uk) and Providing remote education: guidance for schools - GOV.UK (www.gov.uk).
- The effectiveness of the setting's ability to safeguarding learners in respect to filtering and monitoring, information security and access management alongside the above will be reviewed annually in line with the digital and technology standards in schools and colleges Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk).
- Taking a proactive approach in light of the reality that many children now have unrestricted access to the internet, which some of them may use to abuse/sexually harass their peers, to share indecent images consensually and non-consensually and to view/share harmful content.
-

17.8 The School aims to protect and educate the whole School community in their use of technology and to establish mechanisms to identify, intervene and escalate any incident as appropriate. The breadth of risk can be categorised into four areas:

- Content: being exposed to illegal, inappropriate or harmful material. For example, fake news, pornography, racism, radical extremist views, misogyny, self-harm, suicide, anti-Semitism, or extremism.
- Contact: being subjected to harmful online interactions with other users. For example: commercial advertising, adults posing as children or young adults, peer-to-peer pressure
- Conduct: personal online behaviour that increases likelihood of or causes harm. For example, making, sending, and receiving explicit images (consensual or non-consensual sharing of nude or semi-nudes), online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

18. Policy review, Equality and Complaints

18.1 This policy is subject to continuous monitoring, refinement and audit by the Head and Designated Safeguarding Lead taking into account the need to ensure that all members of the school community are made aware of and implement as required any amendments.

18.2 The governors will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing.

18.3 This policy will be reviewed and amended more frequently if changes in legislation, regulatory requirements or best practice guidelines so require. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

18.4 Any child protection incidents at the School will be followed by a review of these procedures by the Designated Safeguarding Lead and a report made to the Governing Body. Where an incident involves a member of staff, the Local Authority Designated Officer (LADO) will assist in this review to determine whether any improvements can be made to the School's procedures.

18.5 The school monitors and evaluates its Safeguarding policy and procedures through the following activities:

- Governing body visits to the school
- Senior leadership team discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Frequent scrutiny of governing body meeting minutes
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- Regular review of parental concerns and parental questionnaires
- Regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school
- Regular review of training offered to staff, including e-safety training.

18.6 With regards to safeguarding we will consider our duties under the Equality Act 2010. General duties include:

1. Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
3. Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

18.7 QEH also adheres to the principles of and promotes anti-oppressive practice in line the Human Rights Act 1998.

18.8 Any complaint arising from the application of this policy should be directed in the first instance to the DSL. Should the complainant be dissatisfied with the response given then they should follow the school's complaints procedures.

18.9 Any complaint arising from the application of this policy should be directed in the first instance to the DSL. Should the complainant be dissatisfied with the response given then they should follow the school's complaints procedures.

SECTION C - APPENDICES

Appendix 1 – Low-Level Concerns Policy

1. Policy Statement

1.1 QEH understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure a culture of openness, trust and transparency that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

1.2 As part of its whole school approach to safeguarding, QEH will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of QEH (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

1.3 Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable QEH to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of QEH are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of QEH.

1.4 This Low-Level Concerns Policy operates in conjunction (as appropriate) with the following:

- Staff Code of Conduct Safeguarding Policy
- Safeguarding and Child Protection Policy
- Grievance Procedure
- Whistleblowing Policy
- Data Protection Policy

2. Introduction to the concept and importance of sharing low-level concerns

2.1 Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

2.2 All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the Staff Code of Conduct.

3. What is the Low-Level Concerns Policy?

3.1 The Low-Level Concerns Policy enables all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour with the Designated Safeguard Lead (DSL), Safeguarding and promoting the welfare of children is everyone's responsibility.

4. What are the aims of the Low-Level Concerns Policy?

4.1 The aims of the Low-Level Concerns Policy are to:

- Ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning or inappropriate behaviour – in themselves and others;
- Empower staff to share any low-level concerns with the DSL and to help all staff to interpret the sharing of such concerns as a neutral act;
- Address unprofessional behaviour and support the individual to correct it at an early stage;
- Identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer ("LADO");
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- Help identify any weaknesses in the QEH's safeguarding provision.

6. Definitions

6.1 Who does the policy apply to?

- The policy applies to all staff whether working in or on behalf of QEH, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.
- Designated Safeguarding Lead (DSL) means the DSL at QEH. The DSL is Mr Nick Pursall, member of the Senior Leadership Team.
- Governing Body means those individuals who are responsible for QEH's governance - i.e. Governors.
- The Head means the Headteacher of QEH- Mr Rupert Heathcote
- Allegation that may meet the harm threshold. The term 'allegation' means it is alleged that an adult who works with children has:
    - Behaved in a way that has harmed a child, or may have harmed a child; and/or
    - Possibly committed a criminal offence against or related to a child; and/or
    - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
    - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school.

6.2 Concern (including an allegation) that does not meet the harm threshold – i.e. a low level concern.

The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head.

Appendix 1 further illustrates the distinction between an allegation that may meet the harm threshold, and a concern (including an allegation) that does not meet the harm threshold – i.e. a low-level concern.

7. School Culture

7.1 QEH promotes an open and transparent culture in which all concerns about all adults working in or on behalf of QEH are dealt with promptly and appropriately.

8. Data Protection and Confidentiality

8.1 QEH will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-Level Concerns Policy and in keeping records of low level concerns secure.

8.2 The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the QEH's Safeguarding Policy.

8.3 A proportionate approach must be taken by all to consider what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms.

8.4 If a member of staff who raises a low-level concern does not wish to be named, then QEH will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived.

8.5 All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by QEH under the Low-Level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. QEH will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns Policy). If the content of a low-level concern is disputed, it may not be appropriate for QEH to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).

8.6 All personal data processed in connection with the Low-Level Concerns Policy will be processed in accordance with QEH's Privacy Notices and its Data Protection Policy.

9. Who should staff share low-level concerns with?

9.1 It is important that low-level concerns are shared with the DSL - Mr Nick Pursall, as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern. Where the concern has been shared with the DSL he will inform the Head as soon as practicably possible.

9.2 If the DSL is absent for any reason, low-level concerns should be shared with the Head.

9.3 If any low-level concern relates to the behaviour of the Head, it should be referred to the Chair of Governors.

9.4 If there is a conflict of interest in sharing a low-level concern with the Head, the low-level concern should be shared with the Chair of Governors, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

10. Should staff who share low-level concerns be able to remain anonymous?

10.1 Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low level concern does not wish to be named, QEH will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, QEH will not promise anonymity to members of staff who share low-level concerns.

11. Should staff share concerns about themselves (i.e. self-report)?

11.1 Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived;
- Crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

11.2 QEH's aim is to create an environment where staff are encouraged and feel confident to self-refer.

12. How should low-level concerns be shared?

12.1 All reports of low-level concerns should be passed to the DSL using the low-level concern form (found in appendix 2), unless the concern is about the DSL when it should be shared with the Head, if it is regarding the Head the information should be shared with the Chair of Governors.

13. How should a low-level concern be responded to?

13.1 Once the DSL has received the low-level concern, they will – not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them:

- Inform the Head of the low-level concern, who will notify the LADO.
- Speak to the person who raised the low-level concern (unless it has been raised anonymously).
- Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary.
- Review the information and determine whether the behaviour in question:
    - Is entirely consistent with the Staff Code of Conduct and the law;
    - Constitutes a low-level concern;
    - Is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary;
    - When considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the QEH's Safeguarding Policy, Part 4 of KCSIE , and the relevant procedures and practice guidance stipulated by the Keeping Bristol Safe Partnership; or
    - The information meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with the QEH's Safeguarding and Child Protection Policy, Part 4 of KCSIE , and the relevant procedures and practice guidance stipulated by the Keeping Bristol Safe Partnership.
    - Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low Level Concerns Policy.
    - Consider whether the concern also potentially raises misconduct or capability issues.

14. What action will be taken if it is determined that the behaviour is entirely consistent with QEH's Staff Code of Conduct and the law?

14.1 The DSL will update the individual in question and inform them of any action taken (as above).

14.2 The DSL will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with QEH's Staff Code of Conduct and the law.

15. What action will be taken if it is determined that the behaviour constitutes a low-level concern?

15.1 The DSL will respond in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on

the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

15.2 Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

15.3 Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

15.4 Some low-level concerns may also raise issues of misconduct or poor performance. The DSL will refer these cases to the Head.

15.5 If the Head considers that further action is required a disciplinary hearing will be convened. The individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

15.6 Staff should be aware that when they share what they believe to be a low-level concern, the DSL will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

16. How should low-level concerns be held?

16.1 QEH will retain all records of low-level concerns (including those which are subsequently deemed by QEH to relate to behaviour which is entirely consistent with the Staff Code of Conduct) in a central low-level concerns file.

17.2 Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded only to a limited number of individuals.

17. How often should the central low-level concerns file be reviewed?

17.1 The Head will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.

17.2 Where a pattern of behaviour is identified in respect of a specific individual, the Head will also consider whether any wider cultural issues are at play that may have enabled the behaviour

and/or whether QEH should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

18. How long should records of a low-level concern be kept?

18.1 Low-level concerns will be retained securely by QEH for as long as deemed relevant and necessary for a safeguarding purpose unless QEH is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves QEH, any low-level concerns which are held relating to them:

- Will be retained at least until the individual leaves QEH / for the same duration as that individual's personnel file; and
- Will not be included in any onward reference, except as set out at paragraph 20.

18.2 Low-level concerns will be retained on the QEH's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

19. References

19.1 Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

19.2 Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

20. What is the role of the Board of Governors?

20.1 The Head will regularly inform the Board of Governors about the implementation of the Low Level Concerns Policy and any evidence of its effectiveness, e.g. by including reference to it in any safeguarding reports and providing any relevant data.

20.2 The Board of Governors will also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

21. Monitoring and Review

The Low-Level Concerns Policy will be monitored to ensure that it is being effectively implemented in practice and will be reviewed annually by the Head and in response to any relevant legislative, statutory or regulatory changes and/or changes in relevant guidance and/or safeguarding best practice.

Definition of Allegation, Low-Level Concern and Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Low-Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that

- Is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work, and
- Does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

The record should be concise – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

Your Details	
Your name and role (Optional)	
Time and date form was completed	
Who the Low-Level Concern refers to	
Name	
Role	
Details of concern	
Please try to include as much detail as possible:	
Signature	

For DSL use only:

Time and date concern received	
Actions and follow up	
Signature	

Appendix 2 - Information on types and signs of abuse and neglect

NB: where list of possible indicators are provided, these are not meant to be exhaustive of all possibilities

The information below outlines possible indicators of different types of abuse. This is not meant to be exhaustive in nature. As a school it must be acknowledged that pupils with SEND are particular vulnerable to abuse including child on child abuse. We help to mitigate these vulnerabilities through a proactive approach and early help where appropriate.

Physical abuse

A form of abuse, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical signs to look out for include:

- Injuries, which the child cannot explain, or explains unconvincingly.
- Injuries, which have not been treated or treated inadequately.
- Injuries on parts of the body where accidental injury is unlikely, such as the cheeks, chest or thighs.
- Bruising which reflects hand or finger marks.
- Cigarette burns, human bite marks.
- Broken bones (particularly in children under the age of two).
- Scalds, especially those with upward splash marks where hot water has been deliberately thrown over the child, or 'tide marks' – rings on the child's arms, legs or body where the child has been made to sit or stand in very hot water.

Behavioural signs to look out for include:

- A child who is reluctant to have parents/carers contacted.
- Aggressive behaviour or severe temper outbursts.
- A child who runs away or shows fear of going home.
- A child who flinches when approached or touched.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.
- Covering arms and legs even when hot.
- Depression or moods, which are out of character with the child's general behaviour.
- Unnaturally compliant behaviour towards parents/carers or carers.

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or

'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional (or other) abuse can also result when Domestic Violence is a feature of family life or when a young person becomes involved in gang culture.

Physical signs to look out for include:

- A failure to grow or to thrive (particularly if the child thrives when away from home).
- Sudden speech disorders.
- Delayed development, either physical or emotional.

Behavioural signs to look out for include:

- Compulsive nervous behaviour such as hair twisting or rocking.
- An unwillingness or inability to play.
- An excessive fear of making mistakes.
- Self-harm or mutilation.
- Reluctance to have parents/carers contacted.
- An excessive deference towards others, especially adults.
- An excessive lack of confidence.
- An excessive need for approval, attention and affection.
- An inability to cope with praise.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place entirely on-line and on-line abuse may be used to facilitate off-line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children as child on child abuse.

Physical signs to look out for include:

- Pain, itching, bruising or bleeding in the genital or anal areas.
- Any sexually transmitted disease.
- Recurrent genital discharge or urinary tract infections without apparent cause.

- Stomach pains or discomfort when the child is walking or sitting down.

Behavioural signs to look out for include:

- Sudden or unexplained changes in behaviour.
- An apparent fear of someone.
- Running away from home.
- Nightmares or bed-wetting.
- Self-harm, self-mutilation or attempts at suicide.
- Abuse of drugs or other substances.
- Eating problems such as anorexia or bulimia.
- Sexualised behaviour or knowledge in young children.
- Sexual drawings or language.
- Possession of unexplained amounts of money.
- The child taking a parental role at home and functioning beyond their age level.
- The child not being allowed to have friends (particularly in adolescence).
- Alluding to secrets, which they cannot reveal.
- Telling other children or adults about the abuse.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical signs to look out for include:

- Being constantly hungry and sometimes stealing food from others.
- Being in an unkempt state; frequently dirty or smelly.
- Loss of weight or being constantly underweight.
- Being dressed inappropriately for the weather conditions.
- Untreated medical conditions – not being taken for medical treatment for illnesses or injuries.

Behavioural signs to look out for include:

- Being tired all the time.
- Frequently missing school or being late.

- Failing to keep hospital or medical appointments.
- Having few friends.
- Being left alone or unsupervised on a regular basis.
- Compulsive stealing or scavenging, especially of food.

Additional concerns: Bullying

Whilst bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable distress and/or anxiety. Explaining verbal or physical abuse away as being 'banter' is not acceptable. Indeed, in some cases bullying is potentially abuse and must be regarded in this light. Please refer to our Anti-Bullying policy for further information. Bullying behaviour can raise safeguarding concerns, and when it does so procedures in this policy will be followed.

Mental Health and Wellbeing

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

QEH will commit to undertake the following

- The appointment of a senior mental health lead who can support the development of knowledge and act as a point of expertise to promote the wellbeing and mental health of learners. This colleague will have sufficient training in mental health and safeguarding for them to carry out their role effectively.
- Early identification of vulnerability to mental health problems by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.
- Ensure that learners can report and share concerns to staff.
- Staff will follow a safeguarding process in terms of reporting concerns via CPOMS so the DSL and deputy DSLs can assess whether there are any other vulnerabilities can be identified.
- Staff will ensure the immediate health and safety of a pupil who is displaying acute mental health distress. This may require support from emergency services via 999 if the pupil is at risk of immediate harm.
- DSLs/Deputies will consider whether a case can be managed internally, through early help, or should involve other agencies
- QEH will communicate and work with parents to ensure that interventions are in the best interests of the child.
- DSLs will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team should be able to access specialist

advice through targeted services or through their locality Primary Mental Health Specialists from Child and Family Consultation Services.

QEH will ensure that preventative measures in terms of providing safeguarding on the curriculum will provide opportunities for pupils to identify when they may need help, and also to develop resilience.

The school will take a 'whole school approach' to:

- deliver high quality teaching around mental health and wellbeing
- having a culture that promotes mental health and wellbeing
- having an environment that promotes mental health and wellbeing
- making sure pupils and staff are aware of and able to access a range of mental health services
- supporting staff wellbeing
- being committed to pupil and parent participation

Appendix 3 - Self-harm

Self-harm can take many physical forms, including cutting, burning, bruising, scratching, hair-pulling, poisoning and overdosing. There are many reasons why children try to hurt themselves. In addition, once they start, it can become a compulsion. That is why it is so important to spot it as soon as possible and do everything you can to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for children to release overwhelming emotions. It is a way of coping. So whatever the reason, it should be taken seriously. There are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure to do well at school, being emotionally abused, grieving or having relationship problems with family or friends.

The feelings that these issues bring up can include:

- low self-esteem and low confidence
- loneliness
- sadness
- anger
- numbness
- lack of control over their lives.

Often, the physical pain of self-harm might feel easier to deal with than the emotional pain that is behind it. It can also make a young person feel they are in control of at least one part of their lives. Sometimes it can also be a way for them to punish themselves for something they have done or have been accused of doing.

Physical signs of self-harm

These are commonly on the head, wrists, arms, thighs and chest and include:

- cuts
- bruises

- burns
- bald patches from pulling out hair.

Children who self-harm are also very likely to keep themselves covered up in long-sleeved clothes even when it is really hot.

Emotional signs of self-harm

The emotional signs are harder to spot and do not necessarily mean that a young person is self-harming. However, if you see any of these as well as any of the physical signs then there may be cause for concern.

- depression, tearfulness and low motivation
- becoming withdrawn and isolated, for example wanting to be alone in their bedroom for long periods
- unusual eating habits; sudden weight loss or gain
- low self-esteem and self-blame
- drinking or taking drugs.

Appendix 4 - Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. There is an assumption that sexual harassment and online sexual abuse are happening within this setting, even if there are no specific reports, this enables us to take a whole-school approach to address them.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.108 It may include:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

The response to a report of sexual violence or sexual harassment

The starting point regarding any report will always be there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. The initial response to a report from a child is incredibly important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual

violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the school guidance on dealing with such disclosures and contact the DSL immediately.

Appendix 5 - Child sexual exploitation

This involves exploitative situations, contexts and relationships where children receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some children who are being sexually exploited do not necessarily exhibit any external signs of this abuse. Child sexual exploitation may be entirely on-line or on-line to facilitate off-line abuse. Child sexual exploitation may be perpetrated by adults or by other children (child on child abuse).

Possible signs of child sexual exploitation include:

- Living in a chaotic or dysfunctional household
- History of abuse
- Gang association either through relatives, peers, intimate relationships or neighbourhood
- Lacking friends from the same age group
- Having difficulties coming to terms with their sexual orientation or unable to disclose sexual orientation to their families
- Learning disabilities
- Young carer or recent bereavement or loss
- Low self-esteem or self-confidence
- Missing from home or care
- Physical injuries
- Drug or alcohol misuse
- Absent from school
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Poor mental health
- Self-harm or thoughts of or attempts at suicide

QEH will ensure that early help intervention is provided as soon as a concern of exploitation is identified. Discussion and advice will be sought from targeted services to consider what support may be available.

If the pupil is at risk of CSE or there is intelligence which indicates that the pupil or peer group are at risk of CSE, QEH will share information with Operation Topaz (the police). This information will support proactive activity to disrupt criminal activity in relation to sexual exploitation.

If the pupil is at risk of CCE information should be shared with Bristol's Violence Reduction Unit - Safer Options. The Safer Options Education Inclusion Managers can advise and support settings to manage risk. Targeted support maybe available to disrupt pupils from getting involved with criminality.

Avon and Somerset Police share 'Missing persons' notifications (which a pupil is reported missing from home or care) with education settings with a view to support them to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. These should be stored securely on the pupil's Safeguarding/Child Protection file.

Domestic Abuse

Domestic Abuse

Operation Encompass is a national information sharing scheme where education settings are notified when the police are called to an incident of domestic abuse. This scheme enables QEH to take proactive action and make reasonable adjustments in relation to behaviour management and achieving positive educational outcomes.

Under the current information sharing protocol, professionals are not permitted to share information without first seeking consent from Avon and Somerset police in case this will put victims and children at further risk of harm. The only exception to this when information is shared with new education setting (part of statutory duties in relation to transfer of the Safeguarding/ Child Protection file, Keeping Children Safe in Education).

QEH will follow Bristol's Local Safeguarding Partnerships procedures when receiving and managing information through Operation Encompass. Our setting will promote an open culture of safeguarding to enable learners and families to disclose and feel safe to talk about their experiences and what support may be required.

Further information can be accessed through the Bristol City Council Safeguarding in Education Team webpages Operation Encompass

Honour-Based Violence (HBV) and Female Genital Mutilation (FGM)

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed supposedly to protect of defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM, or indeed any form of HBV. There is a range of potential indicators that a child or young person may be at risk of FGM or of a forced marriage, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. See: https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

and
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

Possible indicators of FGM include:

- A female child is born to a woman who has undergone FGM
- A female child has an older sibling or cousin who has undergone FGM
- A female child's father comes from a community known to practise FGM
- The family indicate that there are strong levels of influence held by elders and/or elders are involved in bringing up female children
- A woman/family believe FGM is integral to cultural or religious identity
- A girl/family has limited level of integration within UK community
- Parents/carers have limited access to information about FGM and do not know about the harmful effects of FGM or UK law
- A girl confides to a professional that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'
- A girl talks about a long holiday to her country of origin or another country where the practice is prevalent
- Parents/carers state that they or a relative will take the girl out of the country for a prolonged period
- A parent or family member expresses concern that FGM may be carried out on the girl
- A family is not engaging with professionals (health, education or other)
- A family is already known to social care in relation to other safeguarding issues

- A girl requests help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- A girl talks about FGM in conversation, for example, a girl may tell other children about it: so it is important to take into account the context of the discussion
- A girl from a practising community is withdrawn from RSHE education or its equivalent
- A girl is unexpectedly absent from school
- A girl has attended a travel clinic or equivalent for vaccinations and/or anti-malarials.

Child Criminal and Sexual Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or groups takes advantage of an imbalance of power to coerce, manipulate or deceive a child in sexual or criminal activity. The abuse can be perpetrated by individuals or groups and males or females. They may be exploited by other children, who themselves are victims of exploitation.

The abuse can be a one-off occurrence or a series of incidents over time. In some cases, the abuse will be in exchange for something the victim needs or wants (e.g. money, gifts or attention) and/or for other advantage such as increased status. Victims can be exploited even when activity appears consensual, it should be noted that as well as being physical, exploitation can be facilitated and / or take place online.

Age difference may contribute to an imbalance of power, but there are other factors that may make a child more vulnerable to exploitation: gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength access to economic resourced.

Some of the following can be indicators of CSE or CCE:

- Children who appear with unexplained gifts or possessions
- Children who suffer from changes in emotional well-being
- Children who misuse drugs or alcohol
- Children who have older boyfriends or girlfriends
- Display sexual behaviours beyond expected development for age
- Suffer with STIs
- Children who regularly miss school or go missing for periods of time

Further information and definitions of exploitation can be found **Annex B** of **KCSIE** and Home Office's 'Preventing youth violence and gang involvement' and its 'Criminal exploitation of children and vulnerable adults: county lines guidance'

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm

they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas in the UK, using dedicated mobile phone lines or other form of 'deal line'. Exploitation in an integral part of the county lines offending model. Children can be targeted to and recruited from schools, local area and increasingly online using social media. Victims are often subjected to violence, threat of violence towards their families, 'manufactured drug debts' and other coercion.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the Modern Slavery Statutory Guidance.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Appendix 6 - Children Missing From Education

A child who goes missing from education is a potential indictor of abuse, neglect and explotiation. All staff should be aware of the procedures, which are used for searching for and report any pupil missing from school. The school will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. In some circumstances, the School has a legal duty to report absences to the Local Authority.

We have put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. The School has an admission register and an attendance register. All pupils must be placed on both registers.

We will inform our local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents/carers and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period, or
- have been permanently excluded.

We shall inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Looked After Children

If the school has Looked After Children (LAC) on its roll, then each child will have a designated member of staff who will liaise with local children's services and be responsible within the school for monitoring the welfare and progress of the child within the context of a Personal Educational Plan for that child.

The school will co-operate with local children's services with regard to the statutory guidance of the DfE document: *Promoting the Education of Looked After Children.*

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335964/Promoting_the_educational_achievement_of_looked_after_children_Final_23-....pdf

Serious Youth Violence

It is important to note that should a weapon be used or there is threat of use, the police should be called immediately.

- The same day a weapon is found Safer Options should be called for a multi-disciplinary assessment of risk.

- Whilst it is acknowledged that the decision to exclude remains with the Headteacher/principal it is recommended that consultation with the Safer Options Education Inclusion Manger is made so as not to further put the child at further risk of harm if they are excluded.
- Alternatives to exclusions should be considered first in recognition that by doing so a learner it may be at further risk of harm out in the community.
- Police will be notified through the multi-agency discussion held at the 'Out of Court Disposals Panel' to prevent students unnecessarily getting a criminal record.

Appendix 7 - Preventing Radicalisation - The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

We recognise that it is a key role of the school to support children and that school may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils, which may indicate they are at risk of radicalisation.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

The Department of Education statutory Prevent Duty guidance can be accessed on:

https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The School's particular training requirements are that all frontline staff complete the Channel General Awareness course. The School uses the IT filtering system smooth wall to ensure we keep children safe when they are accessing the internet at school.

The school will not permit to enter the school any visitor with links to extremist organisation or who has expressed extremist views. All speakers, contractors and other visitors will be required to undergo an identity check on arrival and wear a visitor's badge. A member of staff will be assigned to supervise any visiting speaker. No unsupervised access to pupils will be permitted for any visitor or contractor. Speakers will provide prior to arrival at the school an outline of what ground they will be covering in their talk or presentation: this will not conflict with the school's aims and ethos nor undermine British values; if it does, the talk or presentation will not be allowed to go ahead. The assigned member of staff will interrupt terminate any talk or presentation if it appears to deviate inappropriately from this outline and/or pose a risk under the prevent duty.

The Channel Programme

Channel is a programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Schools and

colleges which are required to have regard to Keeping Children Safe in Education are listed in the Counter Terrorism Security Act 2015 as partners required to cooperate with local Channel panels.

Visiting Speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School undertakes a risk assessment and completes a checklist (see below) before agreeing to a visiting speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that where appropriate their session should actively promise the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the School site, will be supervised by a school employee. On attending the School, visiting speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

A checklist is provided to assist those proposing to invite speakers to the school.

Signs of radicalisation include:

- Identity crisis - distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal crisis – family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends;
- Personal circumstances – migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet aspirations – perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – experiences of imprisonment; poor resettlement/ reintegration, involvement with criminal groups.

Questions to ask include:

- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict.

- Has there been a significant shift in the young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the young person vocally support terrorist attacks; either verbally or in their written work?
- Has the young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?
- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate?
- Is there evidence to suggest that they are accessing the internet for the purpose of extremist activity?
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Does the young person sympathise with, or support illegal/illicit groups e.g. in propaganda distribution, fundraising or attendance at meetings?
- Does the young person support groups with links to extremist activity but not illegal/illicit e.g. in propaganda distribution, fundraising or attendance at meetings?
- Is there a pattern of regular or extended travel within the UK or abroad, with other evidence to suggest this is for purposes of extremist training or activity or to locations known to be associated with extremism?
- Does the young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the young person have any learning difficulties/ mental health support needs?
- Is the young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the young person have insecure, conflicted or absent family relationships?
- Has the young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the young person's life has extremist view or sympathies?

More critical risk factors could include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage

- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

VISITING SPEAKER - CHECK LIST

Name of speaker: _____

Topic: _____

Year groups/age of audience: _____

Date of visit: _____

Member of staff arranging visit: _____

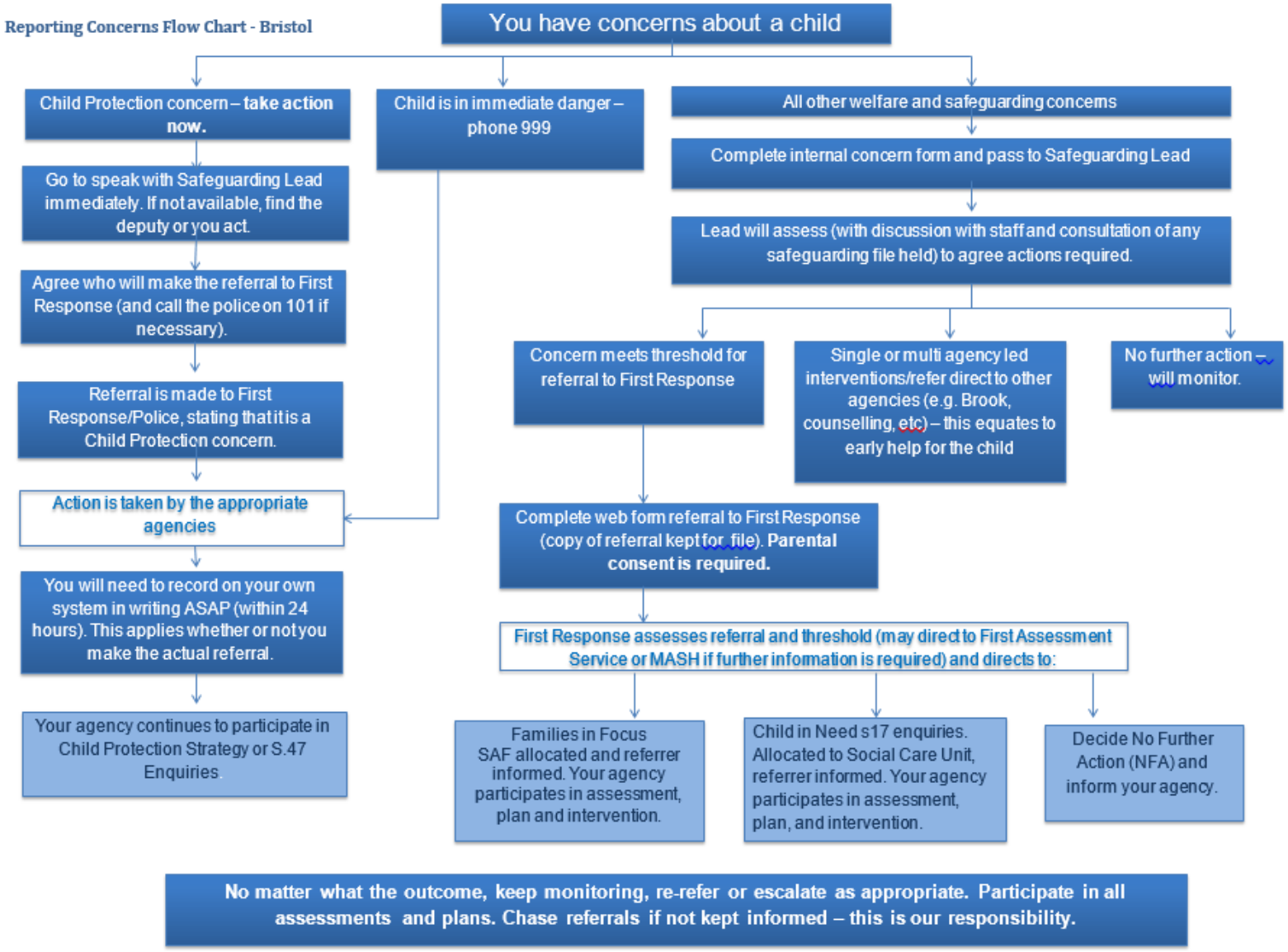
1. Research speaker to ensure they are suitable for the audience ❑
   Please specify source (website, recommendation, return visit etc.):
   _____
2. Agree clear content guidelines with speaker ❑
   Please specify whether Email / phone call:
   _____
3. Arrange for speaker to be met on arrival and returned to reception for departure ❑
   Member of staff responsible: _____
4. Arrange for appropriate supervision for speaker whilst in school ❑
5. Be prepared to interrupt speaker if they deviate from content and/or the content is a cause for concern (and students who ask leading/inappropriate questions) ❑
6. If applicable arrange for invoices/expenses to be passed onto the bursary ❑

Signed: ..... Dated: .....

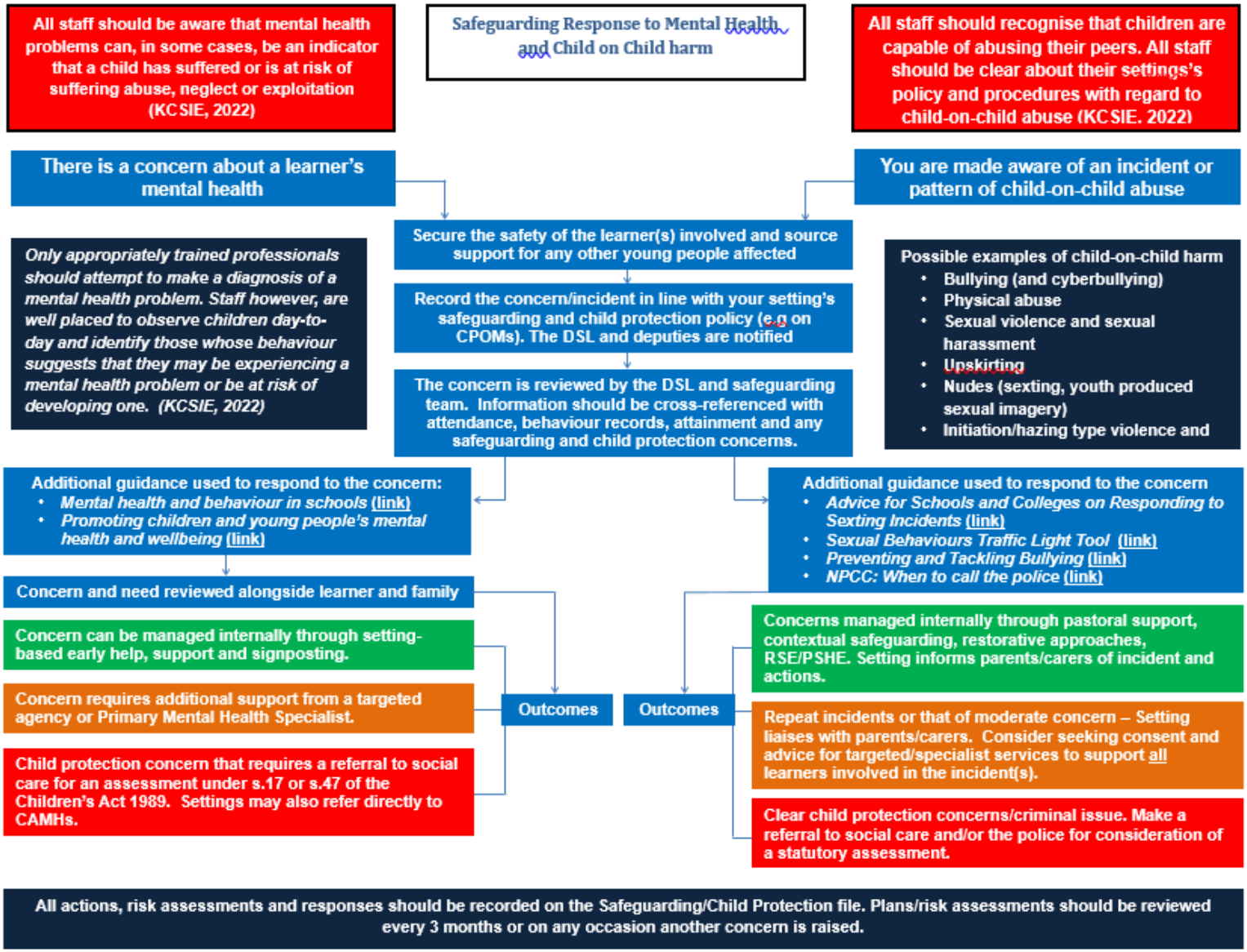
Deputy Head Pastoral: ..... Dated: .....

Appendix 8 – Reporting concerns

Reporting concerns flow chart – Bristol



Process flow chart responding to child-on-child incidents and Mental Health Problems



Appendix 9 - Job description and context of operation for DSLs and Deputy DSLs.

The DSL is a member of the senior leadership of the school. Although responsibilities may be delegated as to appropriately trained deputies, the DSL will take ultimate lead responsibility for safeguarding at the school including the online safety of pupils.

The DSL and their deputies have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals. In addition to this formal training, the DSL and their deputies will also update their skills and knowledge continually and at least annually through studying appropriate guidance from ISI, the local authority, the DfE and others with an interest in maintaining the highest possible standards of safeguarding, and through meeting with other DSLs and members of the local safeguarding community.

The role of the Deputy DSL is to act as DSL (undertaking full responsibility and following procedures exactly as the DSL) in the absence of the DSL and reporting all actions to the DSL as soon as is practicable. When the DSL is present, specific tasks or responsibilities may be delegated to the Deputy DSL under the supervision of the DSL.

The DSL together with his deputies will:

- Understand that the School has the duty to safeguard all children, whether they are children in need or children at risk, and that safeguarding is the responsibility of all at the school.
- Liaise effectively with the local authority and work with other agencies in accordance with https://www.gov.uk/government/publications/working-together-to-safeguard-children--2.
- Ensure that during term time either the DSL or an appropriately trained deputy is always available on site.
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.
- Provide guidance for any member of staff or volunteer who has concerns about any other member of staff or volunteer;
- Ensure that staff safeguarding training records are maintained and identify those in need of update or additional training; this record should include any informal (e.g. through emails, staff meetings, etc.) as well as formal training given.
- Be alert to the specific needs of children in need, those with special educational needs and young carers

Additionally with regard to:

- Children in need: the DSL will ensure that concerns should be referred to children's social care as soon as possible, normally by the DSL; where the identification of need is clear then this referral should take place within 24 hours; in cases where there is doubt about the need then the DSL should take advice from the LCSB about how best to proceed.

- Children at risk: the DSL will ensure that concerns should be referred to children's social care immediately, normally by the DSL. It should be noted that no child should be sent back into a place of potential danger or risk without receiving specific guidance from the KBSP. Where someone other than the DSL makes the referral, the DSL should be informed as soon as possible.
- Children abused by other children: the DSL will ensure that concerns should be referred to children's social care immediately and within 24 hours, normally by the DSL. Where someone other than the DSL makes the referral, the DSL should be informed as soon as possible.
- Children missing from education: the DSL will ensure that all concerns (noting 4.4 above) will be reported to the relevant local agencies; in all cases of doubt, the relevant local agencies will be contacted for guidance. Such reports will also be made when a child is about to be deleted from the admission register for whatever reason.

The DSL and where required their deputies shall also:

- Keep detailed, accurate, secure written records of concerns and referrals. The school's records on child protection are kept securely in the DSL's office, and are separated from routine pupil records. Key staff in school will be informed if a pupil is placed on the Safeguarding Register.
- Pupils who have a safeguarding file in addition to their normal school file have a red sticker placed on the inside cover of their normal school file. A sibling of a pupil who has a safeguarding file will have a green sticker placed on the inside cover of their normal school file.
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage among staff a culture of listening to children in any measures the School may put in place to protect them and to meet the requirements and procedures of the Keeping Bristol Safe Partnership.
- Maintain close links with the KBSP and reports half-termly to the governors' on the child protection issues outlined above. The DSL will make prompt contact with the BCC safeguarding in education team where there are concerns that a child may be in need of help or is at risk of harm. The Head will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the school and/or the police if a criminal offence is suspected.
- Liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children and attend strategy meetings. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.
- Receive focused training to support learning and understanding of the ever changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation. The DSL's and the School's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Single Assessment Framework.

The DSL should note and where required act accordingly:

- Schools should be notified by children's social care when a child on the safeguarding register starts the school, or if a pupil's name has been placed on the register, or if removed from the register. If a safeguarding file has been started for a child who then moves school, the entire contents of the file should be sent to the receiving school/college. The information should be sent under separate cover to the School file, in a sealed envelope to the Head, marked 'Strictly Confidential'.
- The DSL should ensure that all information regarding any safeguarding concern is recorded and passed to them even where this does not result in a referral.
- The DSL should ensure that access to safeguarding files is on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount.
- All information must be shared with children's social care and/or Police and Health, as appropriate, where there is concern that a child is at risk of significant harm. Safeguarding information should not ordinarily be shared with agencies other than these statutory agencies e.g. information should not be released to solicitors etc.
- Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the school, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Head and, if required, to the main points of local procedures of KBSP. Child Protection training is also given to new governors and volunteers. The Head and all staff attend regular refresher training in line with advice from the KBSP with the designated persons receiving training every two years. Training in child protection and safeguarding is an important part of the induction process. Training includes a review of the school's safeguarding policy including the staff code of conduct policy/behaviour policy, the school's whistleblowing policy, awareness training to equip staff to identify children at risk of being drawn into terrorism, the identity of the DSL and a current copy of Part 1 and Annex B of KCSIE. Training also promotes staff awareness of child sexual exploitation, forced marriage and female genital mutilation. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such a practice is suspected.

Furthermore the DSL and as required their deputies shall ensure that the following requirements and procedures are in place:

- All new staff must read and sign to confirm that they have read and understood the current version of Part 1 Annex B of KCSIE and the relevant school policies listed in our Induction procedures for New Staff.
- Allegations against anyone working or volunteering at the school must be referred to the LADO immediately and within one working day, normally by DSL unless subject to the allegation themselves in which case the protocols set down in section 14 above should be followed.
- Seeking confidential (no names basis) guidance from the LADO in those cases where there is any uncertainty relating to such an allegation.

- If a crime may have been committed, the matter should be reported to the police, normally by the DSL unless subject to the allegation themselves. In which case the matter will be handled in accordance with the protocols established in section 14 below.
- Training and general awareness: helping to ensure that all staff, volunteers and governors receive appropriate safeguarding training and guidance, updated as required.
- Specifically ensuring that members of staff, volunteers and governors are fully aware of how they should act should a child make a safeguarding disclosure or should they have a concern about a child.
- Maintaining written records for all individual cases of all communications, discussions, and decisions and the reasons for these decisions.

Managing referrals

The DSL is required to:

(a) Take lead responsibility for referring all cases of suspected abuse of any pupil at the School to children's social care.

(b) Take lead responsibility for referring to the LADO all child protection concerns which involve a member of staff.

(c) Take lead responsibility for making referrals to the Disclosure and Barring Service (DBS) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.

(d) Take lead responsibility for making referrals to the police where a crime may have been committed which involves a child.

(e) Liaise with the Head in respect of police investigations or investigations under section 47 of the Children Act 1989, which involve the School.

(f) Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Raising awareness

The DSL shall:

(a) Ensure this Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.

(b) Ensure this Policy is available publicly.

(c) Ensure that parents/carers are aware that referrals about suspected abuse or neglect may be made to children's social care and the School's role in this.

(d) Maintain links with the Keeping Bristol Safe Partnership.

(e) Ensure staff are aware of training opportunities and

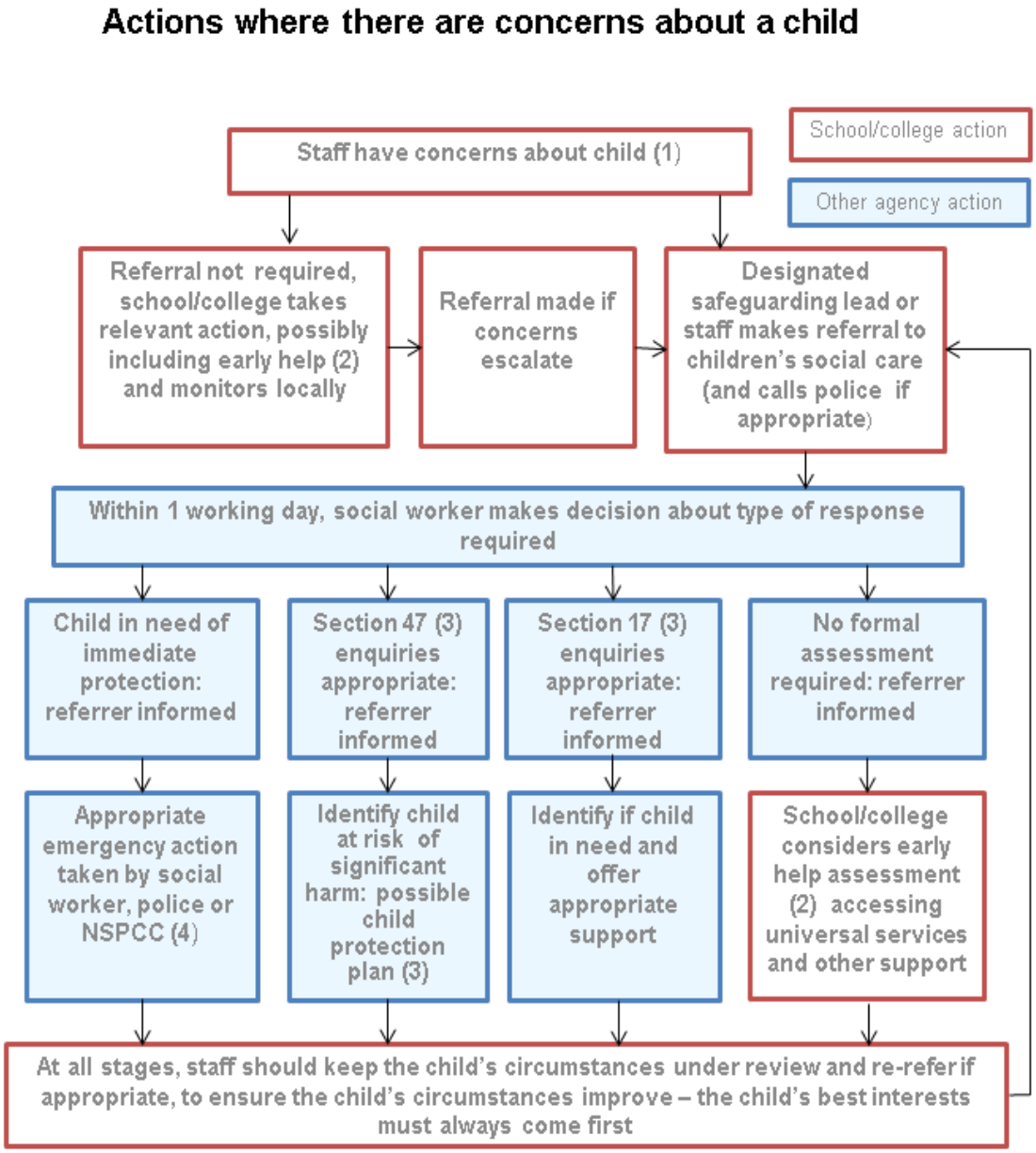
(f) Maintain links with the local policies on safeguarding.

(g) Where children leave the School ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file.

(h) Work with the senior leadership of the school to ensure that pupils are safeguarded from potentially harmful and inappropriate online material.

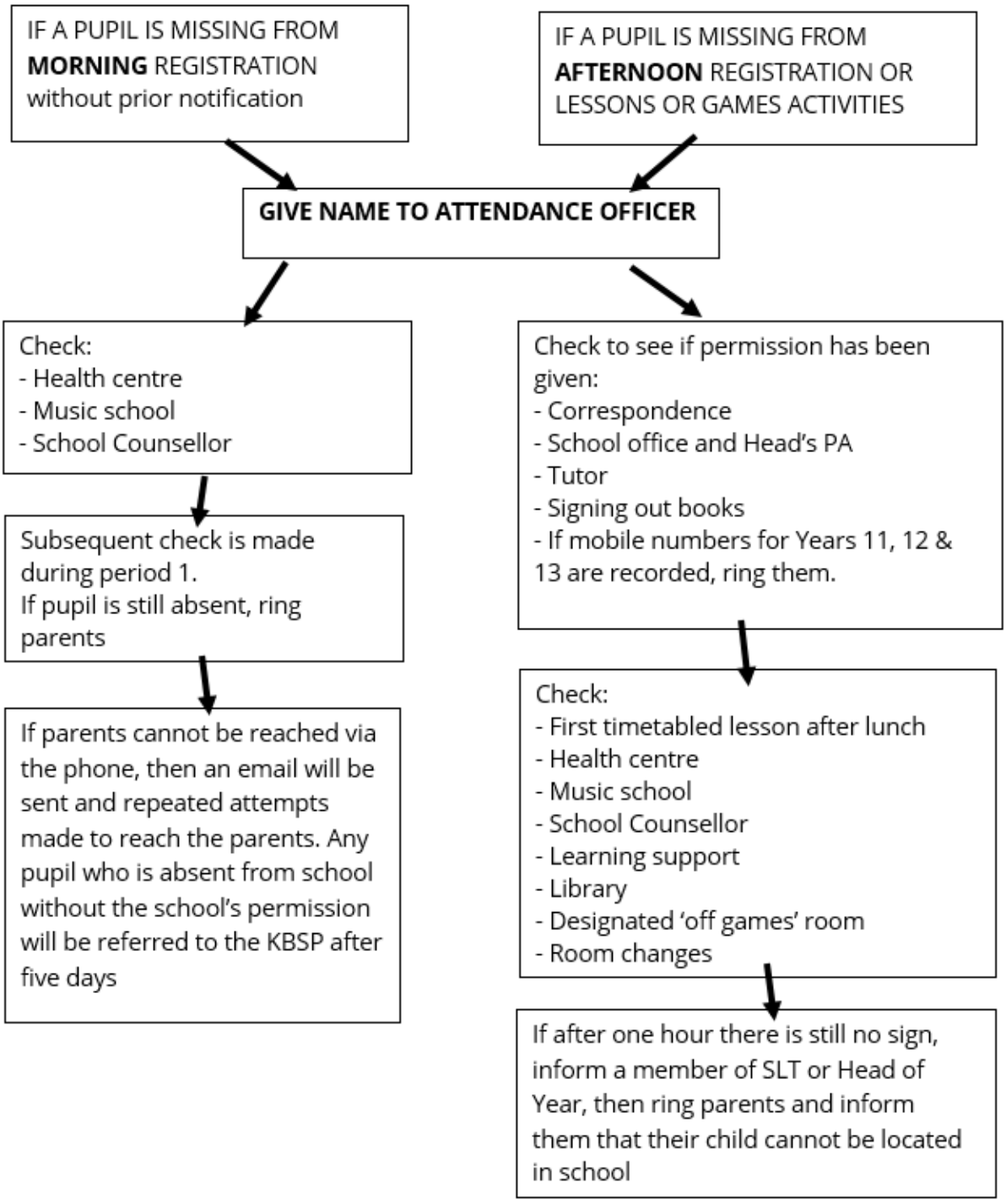
(i) Work with the senior leadership to ensure that all pupils within the school develop a clear understanding of child protection matters and the parts they may play in promoting safeguarding throughout the school community.

Appendix 10 - KCSIE flowchart – actions when there are concerns about a child

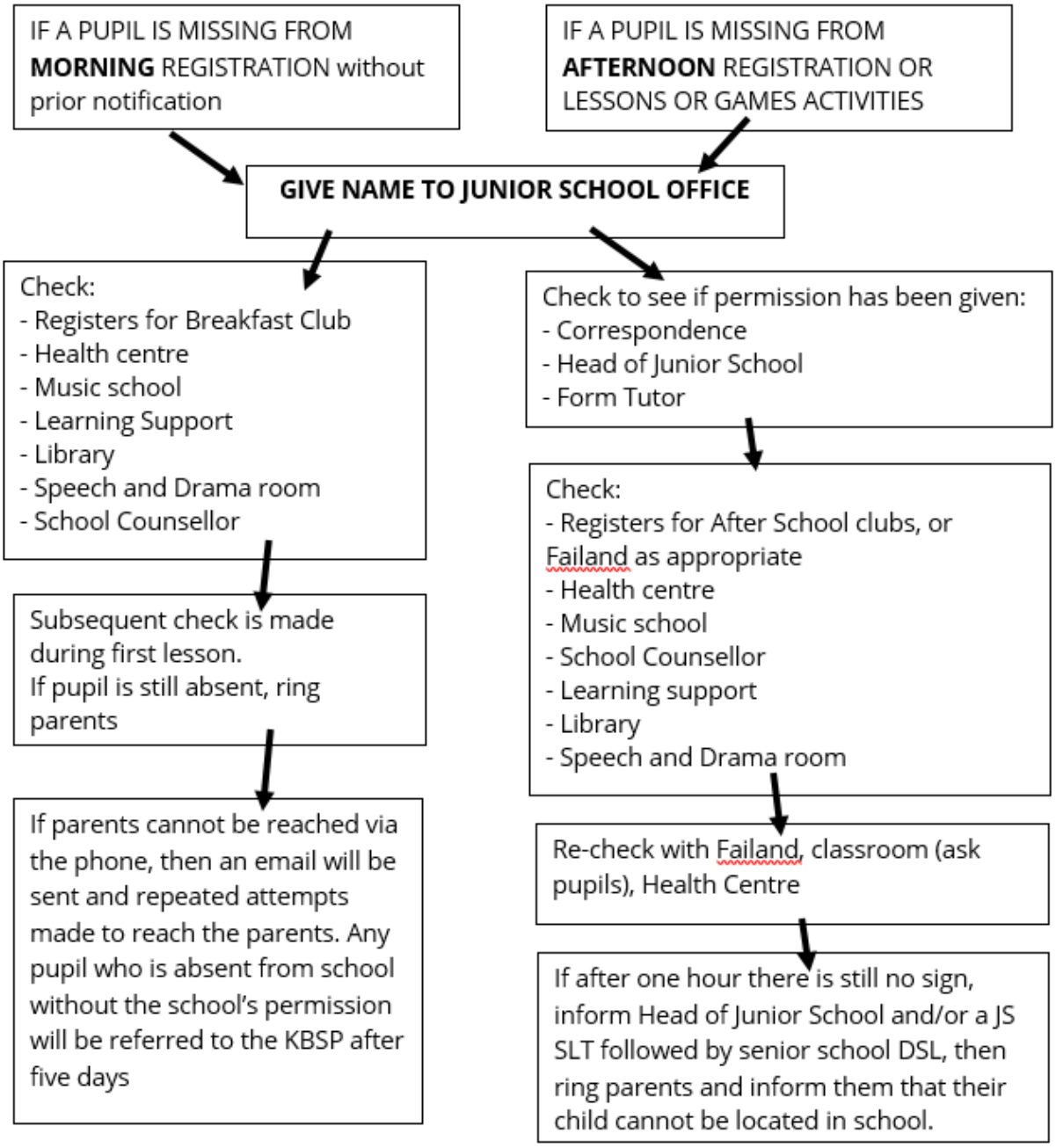


Appendix 11 - Missing pupil protocol

Senior School



Junior School



Appendix 12 - Host families and homestay protocol

In line with KCSIE we have written this protocol to clarify the steps that we take to check the suitability of host families. The intention behind this protocol is not to prevent staff undertaking valuable extra-curricular trips such as language exchanges or make them so administratively unwieldy that they are no longer viable. However, it is of course important to remember our obligations towards safeguarding our pupils.

Checks for host families for exchanges and trips abroad

If the school has power to terminate the host family arrangement, it is likely to amount to regulated activity and therefore an enhanced DBS check with barred list will be carried out. This will be the case even if the parents/carers select the host family. It is worth noting that in these circumstances, it is just the main care-giver in the family who is required to be checked. Adults who are not care-givers are not required to be checked simply because they are present. In our view, it is not necessarily the case that the adult care-giver must be present in the home at all times during the stay, but clearly to be considered a "care-giver" they will need to be present for considerable periods in order to look after the child. A common sense approach will be taken. This will be a factor for consideration in a risk assessment, and the age of the child will be important in determining whether this is necessary. It is also something that will be referred to in any agreement with the parents/carers

Clearly where host families are overseas, it will not be possible to carry out DBS checks. In such circumstances, where possible we will seek reassurances from overseas partners to determine the suitability of host parents/carers, and we will always undertake a risk assessment. We will put an agreement in place with parents/carers to ensure they understand what checks or risk assessments the school has been able to undertake to support parental decisions, if it is to be a private arrangement between families. Decisions to use host families will take account of relevant factors such as the length of the stay, knowledge of the family by a reputable overseas partner and the age of the pupils. We will also ensure that pupils are seen by a member of staff every day while away from home, have access to a mobile phone with signal and/or know who to contact and how, if they have any concerns about their own safety. These steps will be documented in the risk assessments for individual trips.

If the school is involved in the host family arrangement but does not have power to terminate it, then it is unlikely to amount to regulated activity and DBS checks do not need to be undertaken. To ensure there can be no doubt over this, we will enter into an agreement with parents/carers, which ensures absolute clarity. Parents/carers will be asked to sign an agreement which confirms that the hosting is a personal arrangement which the school does not have the right to terminate and also demonstrates that parents/carers are aware that the school has, therefore, not undertaken any checks on the host parents/carers.

If the arrangements are made directly by the parents/carers with no involvement by the school at all, this will be a private arrangement and therefore not regulated activity and no checks will be carried out by the school.

Host Families for international students who attend QEH

All International students ***under the age of 18*** must use a reputable Guardian Agency, agreed by the school. The school would expect a Guardian Agency to carry out enhanced DBS check with barred list on anyone over the age of 16, living in the home. They should conduct home visits and take up GP references for the family. QEH does not have the right to terminate the home stay arrangement, so arrangements with the host family are outside of regulated activity. The homestay arrangement is between Parents/carers and the Guardian Agency. Parents/carers are asked to sign an agreement with QEH to ensure absolute clarity on the school's responsibility.

Our international students have two tutors – a personal tutor who will register them on a daily basis and follow up any absence and an international tutor, Mr R Waldron (Head of Learning Enhancement), who will meet with them regularly and offer EAL and pastoral support when required. This allows us to monitor the students' welfare closely and spot any concerns with the host family.

Appendix 12 – Disqualification from providing childcare or registration.

All staff in our school are required to notify the school immediately if there are any reasons why they should not be working with children.

The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the school immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the school immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Bursar for more details.

REVIEW:

Date policy updated	1 September 2024
Date policy to be reviewed by	31 July 2025 or earlier if required
Policy Owner	Deputy Head (Pastoral)